Dimitar Slavchev Savov 1 61 Nishava str. ent. A, fl. 3, apt. 6 2 Sofia 1680 3 Bulgaria 4 +359 88 99 88 313 5 dimitar.savov@ymail.com 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 9 DIMITAR SAVOV, 10 CIVIL ACTION FILE 2:22-cv-00861-JAD-VCF PLAINTIFF, 11 V. 12 EMPIRE STOCK TRANSFER, INC., 13 DEFENDANT. 14 15 **VERIFIED COMPLAINT** 16 Plaintiff Dimitar Savov ("Savov"), by and through himself, for his Complaint against 17 18 Defendant Empire Stock Transfer, Inc. ("Empire") and alleges as follows: 1. Savov is an adult individual who resides in and is a citizen of Bulgaria. 19 2. Empire is a Nevada corporation doing business as a stock transfer agency in Nevada, 20 21 among other places. 22 **JURISDICTION AND VENUE** 3. This Court has subject matter jurisdiction over this proceeding pursuant to 28 U.S.C. 23 §1332, as this is a dispute between a corporation, incorporated and having a principal place of 24

- business in the State of Nevada and a citizen of the nation of Bulgaria, and the amount in
- 2 controversy exceeds \$75,000, exclusive of interest and costs.
- 4. Defendant Empire is a Nevada corporation with principal office located at 1859
- 4 Whitney Mesa Dr, Henderson, NV 89014, Clark County. Therefore, venue is proper.

BACKGROUND FACTS

- 5. Enzolytics, Inc. ("Enzolytics") is a Delaware corporation, which common stock trade
 on OTC Markets with a trading symbol ENZC, that purportedly develops and commercializes
- 8 proprietary proteins and monoclonal antibodies for the treatment of various infectious diseases.
- 9 6. Savoy, through Immunotech Laboratories BG ("IMMB BG"), has financed and
- developed the project of Immunotech Laboratories Inc. ("IMMB")'s ITV-1 since 2012. As
- such, Savov has completed Phase I, Phase II, Phase III a clinical trial that was successfully
- completed in November 2016 which are part of the permit process for the registration of the
- 13 medicinal product.

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- 7. In March 2017, Harry Zhabilov ("Zhabilov") proposed to merge IMMB and Eco-
- 15 Petroleum Solutions ("ECPO"), the predecessor of Enzolytics, at which time he promised
- Savov and the other Bulgarian investors bonus shares in ECPO as consideration for payment of
- vials for the validation order and for the contribution of Savov to the ITV-1 project.
- 8. On or about June 20, 2017, Zhabilov memorialized the agreement in an email to Savov
- stating that "ECPO will issue the Bulgarian contingency additional shares of ECPO [...] as a
- bonus for the payment for the production on the 9,000 vials." (See Email attached as Exhibit 1).
- 9. Zhabilov further states in the email: "We appreciate all the efforts you have made in
- 22 getting the permit issued in the EU and understand their impact on IMMB and now ECPO."
- 23 (See Exhibit 1)

- 1 10. The email further states, "We will need a list of Bulgarian Shareholders who have
- 2 contributed to the permit process and efforts in Bulgaria to make sure that the Board Resolution
- authorizing the issuance of these shares is correct for the Transfer Agent." (See Exhibit 1)
- 4 11. Included in the "list of Bulgarian Shareholders who have contributed to the permit
- 5 process and efforts in Bulgaria" referenced in the June 20, 2017 email were Ms. Mariya
- 6 Stanislavova Radivoeva and Mr. Daniel Antonov Valchanov.
- 7 12. On July 11, 2017, Savov wired \$190,000 for the production of 3 batches to be utilized in
- 8 the validation of ITV-1. (See p. 2 of Exhibit 2)
- 9 13. Since the announcement of the merger and over the following months Savov wired an
- additional \$151,600 over international wires directly to Zhabilov for the project. (See pages 3-58
- of Exhibit 2)
- 14. The merger between IMMB and ECPO was subsequently terminated in January 2018,
- but by that point Savov had provided full consideration for his shares, which were issued in his
- 14 name on March 6, 2018.
- 15. As consideration for the completion of Phase I, Phase II, and Phase III of the ITV-1
- project and pursuant to the agreement with ECPO, Savov received 71,900,000 shares as
- evidenced by stock certificates 4147-4175, excluding 4152 and 4153. (See stock certificates
- attached as Exhibit 3).
- 19 16. On and about March 16, 2018. Ms. Tiffany Baxter ("Baxter") of the Nevada Agency and
- Transfer Company (NATCO), transfer agent of ECPO at the time, confirmed to Zhabilov that
- 21 the shares that were issued to the Bulgarian investors on March 6, 2018, including those of
- Savov, "are valid on the books and records." (See p. 2 of Exhibit 4).

- 1 17. On and about March 19, 2018, as a result of a further inquiry by Zhabilov in regard to
- 2 the shares of Savov and the other Bulgarian shareholders, Ms. Baxter informed Zhabilov that
- 3 "Once the year has lapsed, the shares are eligible for legend removal pursuant to Rule 144
- 4 assuming the shareholder is not an affiliate of the issuer". (See p. 3 of Exhibit 4).
- 5 18. Savov is not an affiliate of Enzolytics and Savov has held his shares for more than 4
- 6 years as of the date of this filing to the Court.
- 7 19. Enzolytics reported the issuance of Savov shares in multiple disclosures that were filed
- 8 publicly with OTC Markets and certified by their Chief Executive Officer and Chief Financial
- 9 Officer.
- 20. ECPO reported that on March 6, 2018 it issued "223,695,000 shares as compensation to
- several individuals [...] in Bulgaria" in its "Financial Statements For the three months and years
- ending December 31, 2017 and December 31, 2016" (herein after "2018 Financial Statements")
- filed publicly on OTC Markets on April 25, 2018. (See pages 2 and 3 of Exhibit 5)
- 21. Enzolytics reported the issuance of shares to Savov for "services rendered in
- implementing the business strategy in Bulgaria" in its "ISSUER INFORMATION AND
- 16 DISCLOSURE STATEMENT PURSUANT TO Rule 15c2-11" (herein after "2018 Disclosure
- 17 Statement) dated June 4, 2018. (See pages 4 and 5 of Exhibit 5).
- 22. Enzolytics' 2018 Disclosure Statement also states that on March 06, 2018, the Company
- issued 5,000,000 common shares to Ms. Mariya Stanislavova Radivoeva and 3,050,000
- 20 common shares to Mr. Daniel Antonov Valchanov also "for services rendered in implementing
- 21 the business strategy in Bulgaria". (See p. 5 of Exhibit 5).

- 23. The 2018 Disclosure Statement was filed publicly with OTC Markets and certified by
- 2 Zhabilov, Enzolytics' then Chief Executive Officer and Chief Financial Officer. (See p. 6 of
- 3 Exhibit 5).
- 4 24. Enzolytics reported the issuance of 71,900,000 common shares to Savov in March 2018
- 5 in its "Disclosure Statement Pursuant to the Pink Basic Disclosure Guidelines" (herein after
- 6 "2021 Disclosure Statement") dated January 11, 2021. (See pages 7 and 9 of Exhibit 5).
- 7 25. Enzolytics' 2021 Disclosure Statement also states that on March 06, 2018, the Company
- 8 issued 5,000,000 common shares to Ms. Radivoeva and 3,050,000 common shares to Mr.
- 9 Valchanov. (See pages 8 and 9 of Exhibit 5)
- 26. The 2021 Disclosure Statement was filed publicly with OTC Markets and certified by
- 21 Zhabilov, Enzolytics' then Chief Financial Officer and Charles Cotropia Enzolytics' then Chief
- Executive Officer. (See p. 10 of Exhibit 5)
- 27. Savov subsequently made a request to transfer 200,000 of his Shares to a third party on
- 14 September 2, 2021.
- 28. Savoy's shares were placed on a 30-day hold by Empire who stated that unless they
- receive a court order within that time period to stop the transfer, they shall process on the 31st
- 17 day.
- 29. No court order was provided to Empire within that time period and Empire processed
- the transfer, issuing the 200,000 shares to the third party on October 4, 2021 with certificate
- 20 #101005 that states that it represents "FULLY PAID AND NON-ASSESSABLE SHARES OF
- 21 COMMON STOCK OF ENZOLYTICS, INC."
- 30. On December 14, 2021, Savov's then attorney sent to Empire a letter regarding
- 23 "Amended Rule 4(a)(1) Opinion Letter for Dimitar Slavchev Savov for Restrictive Legend

- 1 Removal for 71,700,000 Shares of Common Restricted Enzolytics Inc. (Enzolytics) Stock" (See
- 2 pages 2-8 of Exhibit 6).
- 3 31. On December 15, 2021, Lash, Wilcox and Grace LLP sent an almost identical letter to
- 4 Empire on behalf of Ms. Radivoeva (See pages 9-15 of Exhibit 6).
- 5 32. On December 15, 2021, Lash, Wilcox and Grace LLP also sent an almost identical letter
- 6 to Empire on behalf of Mr. Valchanov (See pages 16-22 as Exhibit 6).
- 7 33. All three letters requested that Empire issue the Shares without the restrictive legend.
- 8 34. Despite the fact that (a) all three letters are identical, except for the shareholder names
- 9 and their respective number of shares, and (b) that Enzolytics has publicly acknowledge that all
- three shareholders earned their shares as compensation for "services rendered in implementing"
- the business strategy in Bulgaria;" Empire granted the requests on behalf of Ms. Radivoeva and
- Mr. Valchanov yet refused Mr. Savov's request, promptly providing Savov with an invoice for
- the rejection and sending Savov his certificates via FedEx.
- 35. Empire did so after a Maryland attorney by the name of Matheau J. W. Stout ("Stout")
- threatened Mr. Grace and forced him to rescind his Opinion Letter.
- 36. Stout has been an OTC Market Prohibited Service Provider since October 15, 2018 and
- is currently on probation imposed by the Court of Appeals of Maryland.
- 37. Stout is not a judge in any Court of Law of the United States.
- 38. Stout claims to officially represent Enzolytics, but has provided no evidence of such
- 20 representation and his name does not appear as Securities Counsel of the company neither on
- 21 the Company's OTC Market webpage, nor in any public disclosures, where only Morgan E.
- 22 Petiti is listed as securities counsel of Enzolytics.

- 39. Stout has previously sued Enzolytics on behalf of Livingston Asset Management (See
- 2 Case No. 1:18-cv-02088-SAG).
- 3 40. Savov subsequently engaged the services of a different attorney who drafted and sent an
- 4 Opinion Letter almost identical in its contents to the letters presented by Ms. Radivoeva and
- 5 Mr. Valchanov, and Savov properly presented his shares to Empire for restriction removal on
- 6 January 11, 2022. (See pages 23-29 of Exhibit 6).
- 7 41. This was confirmed by Casey Weseloh ("Weseloh"), Vice President of Empire, who
- 8 replaced Brian Barthlow ("Barthlow"), the transfer agent who usually processes such requests,
- 9 and stated that, "Everything was presented correctly." (See p. 2 of Exhibit 7).
- 42. In the same email, Wescloh further stated that Savov's shares are placed on a 30-day
- 11 hold and that, "The request date started yesterday, January 11, 2021. If we do not receive a
- court order from a judge to stop this transfer, we will be processing on the 31st day." (See p. 2
- of Exhibit 7).
- 43. In a subsequent email, despite Savov's substantiated argument that a 30-day hold is
- improper in this situation, Patrick Mokros ("Mokros"), President of Empire, reaffirmed the 30-
- day hold and claimed that Empire will strictly follow U.C.C. guidelines.
- 44. Despite the fact that no court order from a judge was received by Empire stopping the
- restriction removal from Savov's shares in the 30-day period and that Empire have confirmed
- that Savov's presentment is in order, Empire did not process the restriction removal and did not
- issue Savov unrestricted shares on the 31st day February 10, 2022.
- 45. Empire have neither processed, nor rejected the restriction removal of Savov's shares
- 22 that was presented to them on January 11, 2022, and have caused unreasonable delay for more
- than 3 months violating 17 CFR § 240.17Ad-2.

- 46. During this time period, the share price has lost more than half of its value and there is a
- 2 high risk that due to the volatile nature of the stock that the value may rapidly decrease even
- 3 further.

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EVIDENCE SUGGESTING ILLICIT INCENTIVISATION NOT TO REMOVE THE

RESTRICTIVE LEGEND FROM SAVOV'S SHARES

- 6 47. Empire and/or their officers Mokros and Martin Blevins, former Vice-President of
- 7 Empire, have previously been sanctioned by the Securities and Exchange Commission ("SEC")
- 8 on three separate occasions. (See Administrative Proceedings File No. 3-15827, 3-15828, and
- 9 3-17729).
- 48. Empire have had a direct connection with Marcus A. Luna ("Luna") who previously
- acted as an undisclosed control person of Empire (See Administrative Proceedings File No. 3-
- 12 15827) and who has been found guilty of various crimes on three separate occasions, on June
- 27, 2014 (See 2:10-cv-02166-PMP-CWH), on October 5, 2017 (See 2:16-cv-07333-BRO-SK),
- and on May 14, 2018 (See SACR 16-12-AG).
- 49. Billy V. Ray Jr. ("Ray"), who has "apparently been appointed by company management
- to handle securities and finance issues" (4:21-cv-00321-SDJ) for Enzolytics, and who, upon
- information and belief, Ray acts as an undisclosed officer of Enzolytics.
- 18 50. Ray has previously been convicted on October 17, 2014 of securities fraud pursuant to
- 19 18 U.S.C. § 1348, after, among other things, has been caught offering illegal kickbacks to an
- 20 undercover FBI agent (See 0:14-60109-CR.ZLOCH.1).
- 21 51. Previously in 2021, Enzolytics, through their representative Ivan Elandjiev appointed by
- 22 Cotropia, had offered Savov to remove the restriction legend from his shares if Savov agrees to
- transfer 51,700,000 of his Enzolytics shares to a party of their choice and his 51% stake in

- 1 IMMB BG along with the company's Exclusive Rights for production and distribution of US
- 2 Patents N° 7,479,538, 7,625,565, 8,066,982, 8,067,531, 8,309,072, as well as the clinical trials
- 3 on ITV-1 conducted by IMMB BG that successfully concluded in November, 2016.
- 4 52. Savov firmly rejected the "offer", as it was not an offer made in good faith to the benefit
- of both sides, but was in fact an extortion with the goal of stealing Savov's shares, business and
- 6 long-term investment.
- 53. On and about January 12, 2022, in an email to Mokros, Weseloh, and Barthlow, Savov
- 8 informed Empire of the extortion and racketeering that he has been subjected to. (See p. 3 of
- 9 Exhibit 7).
- 54. Savov has consulted with other reputable transfer agents on his situation who have
- confirmed that Savov's January 11, 2022 request should have been processed within 72 hours.
- 55. Apart from the violations during the restriction removal process of Savov's Shares
- described in the foregoing and subsequent sections, Empire have also acted against the
- precedents, which they themselves have set in regard to Savov, Mr. Valchanov, and Ms.
- 15 Radivoeva.
- 16 56. Upon information and belief, Empire have acted unreasonably against their own
- 17 precedents and words, as well as the law and guidelines, after receiving illegal kickbacks or
- another form of illicit incentives from Enzolytics or an individual/entity associated with
- 19 Enzolytics.

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VIOLATION OF NEVADA REVISED STATUTE §104.8401

- 57. Nevada Revised Statute ("Nev. Rev. Stat.") §104.8401 provides that "[ilf a certificated
- security in registered form is presented to an issuer with a request to register transfer," the
- 23 issuer "shall register the transfer" provided the following criteria are met:

1 (a) Under the terms of the security, the person seeking registration of transfer is eligible 2 to have the security registered in his or her name; 3 (b) The endorsement or instruction is made by the appropriate person or by an agent who has actual authority to act on behalf of the appropriate person; 4 (c) Reasonable assurance is given that the endorsement or instruction is genuine and 5 authorized: 6 7 (d) Any applicable law relating to the collection of taxes has been complied with; 8 (e) The transfer does not violate any restriction on transfer imposed by the issuer in 9 accordance with NRS 104.8204; (f) A demand that the issuer not register transfer has not become effective under NRS 10 11 104.8403, or the issuer has complied with subsection 2 of that section but no legal 12 process or indemnity bond is obtained as provided in subsection 4 of that section; and 13 (g) The transfer is in fact rightful or is to a protected purchaser. 14 58. The Honorable Alvin K. Hellerstein, United States District Judge states: "If an issuer is 15 under a duty to register a transfer of a security, the issuer is liable to the person presenting a 16 certificated security or an instruction for registration or his or her principal for loss resulting 17 from unreasonable delay in registration or failure or refusal to register the transfer." Shaw v. 18 Empire Stock Transfer Inc., 381 F. Supp. 3d 286 (S.D.N.Y. 2019). 19 59. The Nevada statutes confer "a cause of action for failure by transfer agent to remove a 20 restrictive legend." and "has made a transfer agent's duty the same as that of an issuing 21 corporation". Shaw v. Empire Stock Transfer Inc., 381 F.Supp.3d 286, 290 (S.D. N.Y. 2019) 22 citing Guilfoyle v. Olde Monmouth Stock Transfer Co., 130 Nev. 801, 335 P.3d 190, 195 23 (2014).

- 1 60. Savov received his shares as compensation for services rendered and not based on a
- 2 promise to perform.
- 3 61. It is clear that Mr. Savov rendered those services. Enzolytics has publicly stated that it
- 4 issued the shares for services rendered, not for the promise of rendering services.
- 5 62. By not performing their duty to issue Mr. Savov unrestricted shares. Empire is liable to
- 6 him for the damages he has suffered from his request of Empire to issue his Shares without
- 7 restrictive legend.
- 8 63. Savov's Shares meet all the requirements of Nev. Rev. Stat. §104.8401.
- 9 64. Under Nev. Rev. Stat. 104.8401 and Nev. Rev. Stat. 104.8407 a transfer agent must, on
- proper request, register a transfer of securities without unreasonable delay.
- 11 65. Savov made a proper request upon Empire to register his Shares without restrictive
- legend on January 11, 2022.
- 66. Empire has failed to register Savov's Shares in violation of Nev. Rev. Stat. 104.8401
- and Nev. Rev. Stat. 104.8407.
- 15 67. As a result of Empire's violation of Nev. Rev. Stat. 104,8401 and Nev. Rev. Stat.
- 16 104.8407 Savov has been unable to sell his Shares.
- 68. As a result of his inability to sell his Shares, Savov has suffered damages in excess of
- 18 \$75,000.
- 19 69. As a result of his inability to sell his Shares, due to the decrease in share price from the
- January 11, 2022 opening price of 0.1319\$ per share to the current opening price as of the date
- of this filing of 0.0602\$, Savov has suffered damages in the amount of 5,140,890\$.

- 70. The damages that Savov has suffered can either be determined at trial or in the
- 2 alternative can be calculated as sum certain by multiplying the number of Savov's shares by the
- difference in price between January 11, 2022 and the date of restriction removal.
- 4 71. If a circumstance arises, in which at the time of removal of the restriction legend of
- 5 Savov's shares, the Enzolytics common stock are no longer tradable on OTC Markets and/or
- 6 have lost their value, and as a result Savov is unable to sell them. Empire is liable to the full
- 7 damages suffered by Savov due to the unreasonable delay calculated as the January 11, 2022
- 8 opening price of 0.1319\$ multiplied by the number of Savov's shares, i.e., a sum certain of
- 9 9.457,300\$.

10 INJUNCTIVE RELIEF

I. ORDER REQUIRING EMPIRE TO REMOVE RESTRICTIVE LEGEND

- 72. Savov restates and realleges the allegations of the foregoing paragraphs as if fully set
- forth herein.

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- 73. Savov has properly presented his shares for restriction removal on January 11, 2022.
- 15 74. Empire have a duty to remove the restrictive legend from Savov's shares and issue
- 16 Savov unrestricted shares.
- 75. As of the date of this filing, Empire have not processed the restriction removal request
- made by Savov on January 11, 2022, violating, among other things, their duty as transfer agent.
- 76. As a result of this, Savov has been unable to sell his Shares and has suffered and
- 20 continues to suffer damages in excess of \$75,000.
- 21 77. Since January 11, 2022, Enzolytics' share price has fallen from 0.1319\$ per share to
- 22 0.060\$, which has led Savov's shares to lose more than half of their value from time of proper
- 23 presentment.

- 78. Since January 11, 2022, Enzolytics stock have shown an overall downward trend in their
- 2 price, as well as high volatility.
- 3 79. Due to these factors and the general inherent volatility in penny stock, Savov's shares
- 4 are at a risk of rapidly losing more of their value, causing Savov to sustain further damages and
- 5 irreparable harm.
- 6 80. Empire faces no threatened injury from removing the restrictive legend and have stated
- 7 than an appropriate legal court may approve the legend removal.
- 8 81. Savov has satisfied all legal requirements to have the restrictive legend removed from
- 9 his Shares and to be issued unrestricted Shares.
- 82. Accordingly, Savov is entitled to an order requiring Empire to remove the restrictive
- 11 legend from Savov's Shares and to issue Savov unrestricted shares immediately without
- 12 causing further delay.
- 13 II. ORDER ALLOWING SAVOV TO TRANSFER HIS UNRESTRICTED SHARES
- 14 WITHOUT MEDALLION SIGNATURE GUARANTEE
- 15 83. After Savov is issued unrestricted Shares, in order to transfer the shares to his brokerage
- account, Savov will likely be required by Empire to provide a Stock Power with Medallion
- 17 Signature Guarantee (MSG).
- 18 84. A MSG is used to prevent fraud by verifying that the person making the transfer request
- is the person to whom the shares are issued, but is not common practice anymore and not
- 20 necessary in this instance as Savov has already verified his identity before his broker Saxo Bank
- 21 A/S and can file an Affidavit with the Court affirming that he is the one making the transfer
- 22 request.

1	85. Due to the fact that Savov is a citizen and resident of Bulgaria, he only has access to a	
2	handful of MSG providers who are located in the UK, which makes the process significantly	
3	longer than it is for U.S. citizens.	
4	86. Such additional delay, in conjunction to the unreasonable delay already caused by	
5	Empire, will cause Savov further harm and can be easily avoided under the supervision of the	
6	Court, without posing any risk of threatened injury to Empire.	
7	87. Accordingly, Savov is entitled to an order requiring Empire to transfer Savov's	
8	unrestricted shares to his brokerage account without the need for a MSG.	
9	WHEREFORE, for all the foregoing reasons, Plaintiff DIMITAR SAVOV prays that	
10	this honorable court:	
11	I. Enter an Order requiring Empire to remove the restriction legend from Savov's	
12	shares presented on January 11, 2022 and to issue Savov unrestricted shares;	
13	II. Enter an Order allowing Savov to transfer his unrestricted shares to his	
14	brokerage account without the need of Medallion Signature Guarantee;	
15	FURTHER praying that this honorable court, enter judgment in Savov's favor and against	
16	Defendant EMPIRE STOCK TRANSFER, INC., in an amount above \$75,000 to be calculated	
17	as the difference in share price between January 11, 2022 and the date of restriction removal	
18	multiplied by the number of shares owned by Savov or in the alternative in an amount above	
19	\$75,000 to be determined at trial and for any other relief this court deem just and appropriate.	
20	Dated this 31st day of May, 2022	
21	$-\frac{y}{2}$	
22	✓ ĎIMITAR SAVOV	

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1	UNITED STATES DISTRICT COURT		
2	DISTRICT OF NEVADA		
3			
4	DIMITAR SAVOV,	CIVIL ACTION FILE	
5	PLAINTIFF,	NO.	
6	V.	2:22-cv-00861-JAD-VCF	
7	EMPIRE STOCK TRANSFER, INC.,	1	
8	DEFENDANT.		
9		_	
10	Verification		
11	Pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury/that the facts and		
12	allegations set forth above are true and correct.		
13	Executed on this the 31st day of May, 2022		
14		\mathcal{A}	
15 16		Dimitar Savov	
10			

1	Dimitar Slavchev Savov		
2	61 Nishava str. ent. A, fl. 3, apt. 6		
3	Sofia 1680		
4	Bulgaria		
5	+359 88 99 88 313		
6	dimitar.savov@ymail.com		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
9			
10	DIMITAR SAVOV,	CIVIL ACTION FILE	
11	PLAINTIFF,	NO	
12	V.	2:22-cv-00861-JAD-VCF	
13	EMPIRE STOCK TRANSFER, INC.,	**************************************	
14	DEFENDANT.		
15			
16	ORDER GRANTING PLAINTIFF'S	MOTION FOR PRELIMINARY	
17	INJUNCTION		
18	Plaintiff. Dimitar Slavchev Savov ("Savov") having filed his Motion for a Preliminary		
19	Injunction ("Motion") and the Court having considered the Motion and having found good		
20	cause therefor,		
21	IT IS HEREBY ORDERED that Plaintiff	s Motion is GRANTED and that Defendant	
22	Empire Stock Transfer, Inc. ("Empire") is required	to immediately remove the restrictive	

Ţ	legend from Savov's Enzolytics Shares that were presented to Empire on January 11, 2022 and
2	issue Savov unrestricted shares without further delay.
3	IT IS FURTHER ORDERED that Savov is allowed to transfer his unrestricted shares
4	to his brokerage account at Saxo Bank A/S ("Saxo") without the requirement of a Medallion
5	Signature Guarantee ("MSG") on the condition that Savov provides to the Court a copy of the
6	transfer request along with an Affidavit affirming that Savov is the person making the request.
7	Dated this day of, 2022
8	
9	Hon.
10	United States District Judge

1	Dimitar Slavchev Savov		
2	61 Nishava str. ent. A, fl. 3, apt. 6		
3	Sofia 1680		
4	Bulgaria		
5	+359 88 99 88 313		
6	dimitar.savov@ymail.com		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
9		,	
10	DIMITAR SAVOV,	CIVIL ACTION FILE .	
11	PLAINTIFF,	NC	
12	V.	2:22-cv-00861-JAD-VC	
13	EMPIRE STOCK TRANSFER, INC.,	-	
14	DEFENDANT.		
15			
16	MOTION FOR PRELIMI	NARY INJUNCTION	
17	Plaintiff, Dimitar Slavchev Savov ("Savov"), respectfully moves this Court to issue an		
18	order granting Savov Preliminary Injunction against	order granting Savov Preliminary Injunction against Defendant, Empire Stock Transfer, Inc.	
19	("Empire"), requiring Empire 1) to remove the restrictive legend from Savov's Enzolytics Inc.		
20	(Enzolytics) shares and to issue Savov unrestricted shares; further 2) allowing Savov to transfer		
21	his unrestricted shares to his brokerage account with	hout the need for a Medallion Signature	
22	Guarantee. In support of its motion, Savov states as follows:		
23	INTRODUC	<u>CTION</u>	

- 1. On March 6, 2018, Savov was issued 71,900,000 Enzolytics Inc. ("Enzolytics")
- 2 common stock for "services rendered" as publicly disclosed by Enzolytics, for which Savov has
- 3 provided full consideration and has held for more than 4 years.
- 4 2. On January 11, 2022, Savov properly presented his Enzolytics shares ("Shares") to
- 5 Empire with a request to remove the restriction legend from his shares, for which Savov had
- 6 provided a Valid Legal Opinion letter pursuant to Rule 4(a)(1).
- 7 3. Empire have confirmed that Savov's presentment is in order.
- 4. Instead of processing the restriction removal within 72 hours, as is mandated by 17 CFR
- 9 § 240.17Ad-2. Empire imposed a 30-day hold on Savov's restriction removal.
- 5. Upon doing so, Empire stated that if they "do not receive a court order from a judge to
- stop this transfer, we will be processing on the 31st day" and that they will strictly follow
- 12 U.C.C. guidelines.
- 6. On February 10, 2022, the 31st day after Savov's proper presentment, despite not
- receiving a court order from a judge stopping the restriction removal, Empire did not remove
- the restriction legend from Savov's shares and did not issue Savov unrestricted common stock.

16 ARGUMENT

- 17 I. SAVOV HAS SUFFERED AND WILL SUFFER FURTHER HARM UNLESS
- 18 THE RESTRICTIVE LEGEND IS IMMEDIATELY REMOVED
- 7. By not removing the restrictive legend from Savov's shares on January 11, 2022 or on
- February 10, 2022, Empire have violated U.C.C. guidelines, federal and state securities law,
- and their own word.
- 8. For more than 4 months since Sayov properly presented his shares to Empire for
- restriction removal on January 11, 2022 and for more than 3 months after the 30-day hold

- expired on February 9, 2022, despite Savov's repeated requests to Empire to follow the laws
- and guidelines, Empire have neither processed, nor rejected Savov's request for restriction
- 3 removal.
- 4 9. A transfer agent may either process or reject a restriction removal request, but Empire
- 5 have failed to do either, continuing to cause unreasonable delay and harm to Savov.
- 6 10. As a result of Empire's violations and failure to remove the restrictive legend from
- 7 Savov's shares. Savov has been unable to sell his Shares.
- 8 11. As a result of his inability to sell his Shares, Savov has suffered damages in excess of
- 9 \$75,000.
- 10 12. Since Savov properly presented his shares, the Enzolytics share price has fallen from
- 0.1319\$ per share (opening price on January 11, 2022) to 0.0929\$ per share (opening price on
- February 10, 2022) to 0.0602\$ per share at which the shares opened on the date of this filing.
- which illustrates the following:
- a. During the 30-day hold. Savov's shares have lost 2.796,300\$ in value.
- b. Since February 10, 2022, Savov's shares have further lost 2.344,590\$ in value.
- c. Since January 11, 2022, Savov's shares have lost more than half of their value,
- specifically Savov's shares have lost 5,140,890\$ in value.
- 18 13. Since January 11, 2022, Enzolytics stock have shown an overall downward trend in their
- price, as well as high volatility.
- 20 14. Due to these factors and the general inherent volatility in penny stock, Savov's shares
- are at a risk of rapidly losing more of their value, causing Savov to sustain further damages and
- 22 irreparable harm while Empire answers the Verified Complaint and this case is decided.

1 15. Empire faces no threatened injury from removing the restrictive legend from Savov's 2 shares and have stated that an appropriate legal court may approve the legend removal. 3 16. Savov has a high probability of success on the merits, as Savov has properly presented his shares for restriction removal on January 11, 2022, Empire have failed to remove the 4 restriction legend on January 11, 2022 or February 10, 2022 despite not receiving a court order 5 stopping the restriction removal, the value of Savov's shares has declined significantly since 6 7 then, and Sayov has suffered damages in excess of 75,000\$ due to his inability to sell his shares as a result of Empire's actions. 8 17. It is in the public interest for transfer agents such as Empire to strictly follow the law 9 and guidelines, and to not have the ability to arbitrarily violate those laws, guidelines, and their 10 own word, as otherwise people will fear that the law does not protect their investment and will 11 be hesitant to invest in the U.S. markets. 12 18. It is in the public interest for investors to know that in cases when a transfer agent has 13 failed to perform their duties, the Court will protect the investor and will require from said 14 transfer agent to execute their duties in a timely manner. 15 19. Accordingly, Savov is entitled to be granted his request for a preliminary injunction in 16 the form of a Court order, requiring Empire to immediately remove the restrictive legend from 17 Savov's shares and to issue Savov unrestricted shares. 18 SAVOV MAY TRANSFER HIS UNRESTRICTED SHARES WITHOUT THE II. 19 NEED FOR A MEDALLION SIGNATURE GUARANTEE 20 21 20. In order to sell his shares once the restriction legend is removed and they are issued as 22 unrestricted, Savov will need to transfer the Shares to a brokerage account.

- 21. Empire usually requires a Stock Power with a Medallion Signature Guarantee ("MSG")
- 2 in order to transfer shares to a brokerage account.
- 3 22. Since Savov is a Bulgarian resident and citizen, he has access to only a handful of
- 4 members of the Medallion Signature Guarantee Program who are based in the United Kingdom.
- 5 23. To attain an MSG, Savov must first send all required documents via email for a pre-
- 6 approval process, which, once approved, must then be sent via international shipping to the UK
- 7 based MSG provider, who, after placing the MSG on the Stock Power, must in turn send the
- 8 documents to Empire via international shipping.
- 9 24. Thus, obtaining an MSG may take Savov more than 2 weeks, which is in stark contrast
- to U.S. citizens who have the ability to acquire an MSG locally and provide it to a transfer
- agent within 3 business day and who have access to a myriad of member of the Medallion
- 12 Signature Guarantee Program.
- 25. An MSG is used to prevent fraud by verifying that the person making the transfer
- request is the person to whom the shares are issued.
- 26. Savov has a brokerage account with Saxo Bank A/S ("Saxo"), a reputable international
- broker, where Savov has already verified his identity.
- 27. Savov can make a transfer request via Saxo, which can be executed through the DWAC
- or DRS system, thus significantly reducing the risk of identity fraud.
- 28. Once Savov has made a transfer request with Saxo. Savov can present a copy of the
- transfer request to this Court along with an Affidavit to show that he is the one making the
- 21 request, thus entirely removing the need for a verification via a MSG.
- 22. Savov is at risk of suffering further irreparable harm during the time it may take him to
- 23 acquire an MSG and provide it to Empire.

1	30. Empire faces no threatened injury from transferring Savov's unrestricted shares to
2	Savov's brokerage account at Saxo without a MSG upon a transfer request from Savov and
3	under the supervision of this Court.
4	31. Accordingly, Savov is entitled to be granted his request for a preliminary injunction in
5	the form of a Court order, allowing Savov to transfer his unrestricted shares to his brokerage
6	account without the need for a MSG.
7	
8	WHEREFORE, Savov respectfully requests that this Court grant Savov's Motion for
9	Preliminary Injunction and enter an order requiring Empire 1) to remove the restrictive legend
10	from Savov's Shares and to issue Savov unrestricted shares; further 2) allowing Savov to
11	transfer his unrestricted shares to his brokerage account without the need for a MSG.
12	Dated this 31st day of May, 2022
13	
14	DMITAR SAVOV

EXHIBIT 7

RE: Removal of Restriction Legend from my Enzolytics Inc. (ENZC) Shares

From: Casey Weseloh (casey@empirestock.com)

To: brian@empirestock.com; dimitar.savov@ymail.com

Cc: cliffredekop@gmail.com; patrick@empirestock.com

Date: Wednesday, January 12, 2022, 08:43 PM GMT+2

Hello Dimitar.

Everything was presented correctly. We presented the item to our counsel, and they advised that we honor the companies request for a 30 day hold pursuant to UCC Article 8.

The request date started yesterday, January 11, 2021. If we do not receive a court order from a judge to stop this transfer, we will be processing on the 31st day.

Thank you,

Casey Weseloh

Empire Stock Transfer Inc.

casey@empirestock.com | P (702) 818-5898 | F (702) 974-1444 | www.empirestock.com

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1

Re: Removal of Restriction Legend from my Enzolytics Inc. (ENZC) Shares

From: Dimitar Savov (dimitar.savov@ymail.com)

To: casey@empirestock.com

Cc: brian@empirestock.com; cliffredekop@gmail.com; patrick@empirestock.com

Date: Wednesday, January 12, 2022, 10:21 PM GMT+2

Dear Casey Weseloh and Brian Barthlow,

The previous time that we presented the documents for restriction removal in December 2021, the company tried to place a 30-day hold. At that point, Mr Brian Barthlow and Empire Stock Transfer declined their request, citing correctly that they have tried to do the same in October and did not present a single document at the time. In all three occasions, Enzolytics Inc. is trying to place a 30-day hold on all of my shares, not a separate certificate. Further, it is against all reason for Empire Stock Transfer to first decline the company's request for a 30-day hold in December, but to honor it now, when in both occasions I am presenting the same certificates for restriction removal, especially when the company has not attained any document from the court since December 16th. It is clear that Enzolytics Inc. does not plan to attempt to attain a court order, but are simply engaging in malicious prosecution against me.

I have informed the regulatory agencies, including the SEC, FINRA, and OTC Market Surveillance Group, regarding the numerous criminal activities done by the management of Enzolytics Inc; I am attaching to this email my 7 TCR Reports. There is a systematic lawlessness and harassment placed upon me by the company using any means necessary, including using the services of OTC Market Prohibited Service Providers, which You are aware of, to stop my ability to make a return on my investment for shares that I have acquired legally. A legal representative of Enzolytics Inc appointed by Charles Cotropia, namely Ivan Elandjiev, has informed me that the management of Enzolytics will lift the restriction legend from 20,000,000 of my shares, if I transfer the other 51,700,000 to a person or entity of their choice, along with the rights to the Clinical Trial of ITV-1 that I have conducted in Bulgaria, and my entire business. I declined this offer, because it is an extortion and theft, for which reason the harassment against me continues. I have enough evidence of this and only my desire to not damage the company has held me from informing the judicial and enforcing agencies in the US and Bulgaria about this extortion.

I hope that You reconsider and that You execute the process within 72 hours as is mandated by law, so that You do not inadvertently become an accomplice to their unjustified and illegal-criminal actions against me.

Best regards,

Dimitar Savov

EXHIBIT 6

LASH WILCOX & GRACE PL

Attorneys and Counselors at Law

2202 WEST SHORE BLVD., STE. 200 TAMPA, FL33607 phone 813.639.4205 fax 813.639.7501 Direct Dial: 813.639.4206 kgrace@lashwilcoxandgrace.com www.willtrustkengrace.com

December 14, 2021

To: Empire Stock Transfer via email to info@empirestock.com

Re: Amended Rule 4(a)(1) Opinion Letter for Dimitar Slavchev Savov for Restrictive Legend Removal for 71,700,000 Shares of Common Restricted Enzolytics Inc. (ENZC) Stock¹

Dear Stock Transfer Agent Professional:

This office has been requested to render an opinion regarding the removal of the restrictive legend from a total of 71,700,000 shares (the "Shares") of common stock of Enzolytics Inc. (the "Company" or "ENZC") in the name of Dimitar Slavchev Savov. ("Shareholder").

Summary: The Shareholder acquired the Shares from the Company on 3/6/18.² In the opinion of this office Shareholder is not an issuer, dealer or underwriter with respect to the sale of the Shares as outlined herein; therefore, the exemption in Section 4(a)(1) of the 1933 Securities Act ("Act") applies. As such, the 71,700,000 Shares may be issued without a restrictive legend, and they may be sold on the open market pursuant to Section 4 of the Act.

Background: On 3/6/18, the Company issued 71,700,000 Shares to Shareholder and did so by issuing 52 stock certificates. See Account Statement, which contains all 52 stock certificate numbers and reflects the issuance of all Shares.

Affiliate Status: Shareholder is not an affiliate (officer, director, manager, 10% or more Voting/Preferred Stockholder) of the Company at the time of the proposed sale, and as far as we can tell, has never been an affiliate of the Company.

Current Public Information: The Company is a non-reporting company. It has not filed anything with the SEC, and it has never filed any 10-Ks or 10-Qs. However, it has been filing reports and other documents in OTC Markets. There are several and recent quarterly reports on file as well as several and recent annual reports filed with OTC Markets. It also has also periodically filed various supplemental information, notifications and letters. There are letters on file from attorneys confirming that there is adequate current information available to the public. As such, there is adequate current public information available regarding the Company. Notwithstanding, a company's current public information is irrelevant for purposes of Rule 4(a)(1).

¹ Amended to correct scrivener's error of middle name; otherwise; identical.

² There is no agreement that would serve as any type of source documentation for the Shares. Shareholder owns the rights to the biotech technology in a Bulgarian LLC, and he was negotiating with between the Company (Enzolytics Inc. – ENZC – OTC Pink) and Immunotech Laboratories. Inc. (IMMB - OTC Pink) to gain a further interest in the technology. As a result of these negotiations, the Company issued to Shareholder the Shares, which was basically rewarding his ownership and investment in that other company and compensation for his efforts in the described negotiations. All IMMB shareholders were issued shares. The deal never closed between the two Companies, but Shareholder had earned the shares based on his good faith negotiations with ENZC.

Shell Status: The Company is not currently a shell, and from what we have been able to determine, it was never a shell company since it has been Enzolytics Inc. However, before the Company was Enzolytics, it was known as: Immunotech Laboratories, Inc.- September 11, 2017; Eco-Petroleum Solutions, Inc.-November 16, 2012; Structural Enhancement Technologies Corp.- May 10, 2010; Extreme Mobile Coatings Worldwide Corp.- March 2, 2009; Extreme Mobile Coatings Corp., Ltd. -October 10, 2008; Falcon Media Services, Ltd.- November 24, 2004; T&T Homes Limited -July 28, 2004. And the Company was incorporated and domiciled in the United Kingdom from 2004 to 2009. Therefore, we cannot state for certain whether or not the Company was a former shell. We have made inquiries into the shell statuses of these predecessors; however, to date, we have not been able to confirm non-shell status. We may be able to make such a confirmation in the future. However, for now, we will treat the Company as is if one or more of its predecessors was a shell. In that the Company is a non-reporting or alternate reporting company and does not have three current 10-Qs and a 10-K on file with the SEC, it has not cured any former shell status. However, under Section 4(a)(1) of the Act, the Company's status as a shell is irrelevant.

Legal Analysis of the Relevant Sections and Specific Exemption at Issue: Section 5(a) of the Act prohibits the sale of unregistered securities. However, §4(a)(1) of the Act exempts certain transactions from the §5 registration requirement. Specifically, §4(a)(1) exempts "transactions by any person other than an issuer, underwriter, or dealer."

The Shareholder herein is not an "issuer" as defined by § 2(a)(4). The term "issuer" means every person who issues or proposes to issue any security; except that with respect to certificates of deposit, voting-trust certificates, or collateral-trust certificates, or with respect to certificates of interest or shares in an unincorporated investment trust not having a board of directors (or persons performing similar functions) or of the fixed, restricted management, or unit type, the term "issuer" means the person or persons performing the acts and assuming the duties of depositor or manager pursuant to the provisions of the trust or other agreement or instrument under which such securities are issued; except that in the case of an unincorporated association which provides by its articles for limited liability of any or all of its members, or in the case of a trust, committee, or other legal entity, the trustees or members thereof shall not be individually liable as issuers of any security issued by the association, trust, committee, or other legal entity; except that with respect to equipment-trust certificates or like securities, the term "issuer" means the person by whom the equipment or property is or is to be used; and except that with respect to fractional undivided interests in oil, gas, or other mineral rights, the term "issuer" means the owner of any such right or of any interest in such right (whether whole or fractional) who creates fractional interests therein for the purpose of public offering. Here, Shareholder is not an issuer since it is not the entity that issued the Shares. Further, Shareholder is not the Company, nor is he controlled by the Company. See § 2(a)(4).

Likewise, the Shareholder is not a "dealer" as defined by § 2(a)(12). See § 2(a)(12). The term "dealer" means any person who engages either for all or part of his time, directly or indirectly, as agent, broker, or principal, in the business of offering, buying, selling, or otherwise dealing or trading in securities issued by another person. Here, Shareholder does not deal or trade in securities issued by another person. Shareholder is retired, but used to be a consultant, a negotiator and a business owner of a biotechnology company. Shareholder is not in the business of buying and selling securities, directly or indirectly. And Shareholder is not licensed as a dealer. Therefore, Shareholder is not a dealer.

The critical issue in this instance is whether the Shareholder is an "underwriter" as defined by § 2(a)(11). The term "underwriter" means any person who has (1) **purchased** from an issuer

with a view to, or (2) offers or sells for an issuer in connection with, the **distribution** of any security, or (3) participates or has a direct or indirect participation in any such undertaking, or (4) participates or has a participation in the direct or indirect underwriting of any such undertaking; but such term shall not include a person whose interest is limited to a commission from an underwriter or dealer not in excess of the usual and customary distributors' or sellers' commission. As used in this paragraph the term "issuer" shall include, in addition to an issuer, any person directly or indirectly controlling or controlled by the issuer, or any person under direct or indirect common control with the issuer. These four main parts of the definition make up the "four tests of underwriter status," which are detailed and addressed below.

- -Whether or not the seller purchased his or her securities from the issuer: The seller (the Shareholder) did not **purchase** the securities (the Shares) from the issuer (the Company). Regarding the Shares, Shareholder acquired them for his investment in the third party company and for his negotiation work, and as such, they were not purchased, and certainly not purchases as part of an IPO.
- -Whether or not the seller is offering or selling for the issuer: The seller (the Shareholder) did not and is not offering or selling the securities (the Shares) for the issuer (the Company).
- -Whether or not the seller participated or had a direct or indirect participation in any such **distribution**: The seller (the Shareholder) did not participate directly or otherwise in any distribution.
- -Whether or not the seller participated or had a participation in the direct or indirect underwriting of any such **distribution**: The seller (the Shareholder) did not participate directly or otherwise in any underwriting of any **distribution**.

And the person (the Shareholder) is not: (a) directly or indirectly controlling or controlled by the issuer (the Company) nor is he (b) under direct or indirect common control with the issuer (the Company).

First, distribution is not defined by the Act, but it is widely accepted that it means "public offering." Therefore, the first prong of the analysis is whether a nonpublic offering can be shown to have been made by the Company. In such a case, the possibilities are greatly diminished that a shareholder's subsequent sale of shares would be considered a distribution and that the shareholder would be deemed an underwriter.

Section 4(a)(2) of the Act, which is applicable to issuers, exempts from the registration requirements under the Act transactions by an issuer not involving a "public offering." In the determination of whether or not the issuance of the Shares was a "public offering," we look to the factors set out by the following publications:

- (a) SEC v. Ralston Purina Co., 346 U.S. 119 (1953);
- (b) Doran v Petroleum Management Corp., 545 F.2d 893, 900 (5th Cir. 1977);
- (c) Hill York Corp. v. American Int'l Franchises, Inc., 448 F.2d 680, 687-89 (5th Cir. 1971);
- (d) Securities Act Release No. 4552 (November 6, 1962).

These publications set out factors in determining whether an offering is public or private, including: (1) the number of offerees and their relationship to each other and to the issuer, (2) the number of units offered, (3) the size of the offering, and (4) the manner of the offering. We also look to the factors set forth in *Cook v. Avien*, *Inc.*, 572 F.2d 685, 691 (1st Cir. 1978) (Holding

that sales may be exempted if private offering is made in which purchasers are limited in number, are sophisticated, have a relationship with the issuer enabling them to command access to information that would otherwise be contained in a reg. statement.).

Regarding the Shares, they were issued as part of a private transaction not a public offering. The shares were issued to Shareholder for his investment in the third party company and for his negotiation work. And the manner of the offering was private not public. This leads us to conclude that the transaction at issue did not amount to a public offering, and as such, not a distribution.

Second, a factor to be analyzed is whether or not the Shares were acquired with an intent to distribute or of they came to rest with the Shareholder. Here, they were not. Consider the following:

Over the years, interested persons and entities looked at the amount of time a shareholder held the securities in order to ascertain whether they were acquired with an intent to distribute or whether they came to rest. And since intent is difficult to establish and prove, interested persons and entities looked to other sections in the Act in order to fashion a test. At that time, years ago, the safe harbor in Rule 144 was two (2) years. Before 2008, under Rule 4(a)(1), two (2) years was generally the amount of time the shareholder had to hold the shares in order to be able to state that the shares were not acquired with a view toward distribution and instead came to rest with the shareholder. The seminal cases before 2008 were *U.S. v. Sherwood*, 175 F. Supp. 480, 483 (1959) and *Ackerberg v. Johnson*, 892 F.2d 1328 (1989). This two (2) year rule of thumb was based on the SEC's safe harbor provision under Rule 144, which at that time, was two (2) years.

However, since *Sherwood* and *Ackerberg*, the Act was amended. On 2/15/08, the adopted amendments to Rule 144 and Rule 145 of the Securities Act took effect and were implemented to increase the liquidity of privately sold securities and securities acquired in business combinations by giving holders the ability to resell those securities more rapidly without registration under the Securities Act. Amongst other amendments, the Rule 144 amendments shortened the holding period for the resale of restricted securities of reporting companies under this safe harbor from six (6) month holding period for securities issued by a reporting company current and in good standing with the SEC held by a non-affiliate, and a one (1) year holding period otherwise.

Since the 4(a)(1) holding period "rule of thumb" was based on the safe harbor of Rule 144, arguably once Rule 144 was amended, the holding period "rule of thumb" under Rule 4(a)(1) moved from two (2) years to at one (1) year. And while this change under Rule 4(a)(1) was not formalized, many attorneys and scholars have picked up on the amendment and resulting connection and change and are reaching the conclusion that a shareholder who holds stock for a year does implicate the requisite lack of intent to distribute and finding that the stock did come to rest with that shareholder.

Here, Shareholder has held all of the Shares since 3/6/18, which is when the stock certificates were issued. Therefore, the Shareholder has held the Shares for over two (2) years. And in light of the 2008 amendment to the Act and the argument above, which others have made and with which we agree, we reach the conclusion that the Shares were not acquired with a view toward distribution and instead came to rest with the Shareholder.

Based on the foregoing and in particular, the plain language of the Act and the body of regulations, article, and cases interpreting the Act, in our opinion, Shareholder is not an underwriter. Therefore, Section 4(a)(1) exempts the transaction from the Section 5 registration requirement at issue.

Disclaimer:

As counsel, we have examined facts and questions of law as we have considered appropriate for purposes of this letter. In preparation of a prior letter on this matter, we have relied upon assurances of our client and his agents and representatives, the officers of the Company, and others as well as all reports filed with the SEC in compliance with the Act without having independently verified such factual matters. We are and OTC Markets pining herein as to the federal securities laws, and we express no opinion with respect to the applicability thereto, or the effect thereon, of the laws of any other jurisdiction or as to any matters of municipal law or the laws of legal agencies within a state.

We have relied upon the following additional information in rendering our opinion:

- 1. That the information provided to us by the Shareholder referenced herein and that it is true and correct.
- 2. That the information the Company disseminated to the SEC, OTC Markets, and the public, and that it was true and correct and timely.
- 3. That the Shareholder did in fact acquire the stock at issue for sufficient consideration as represented.
- 4. That the Shareholder is the true and valid holder of the Shares.
- 5. That the Shareholder is not and was not: an officer, director, owner of ten percent (10%) or more of the outstanding capital stock of the Company or is otherwise in a controlling position with, or an affiliate of, the Company (nor been so designated during the ninety (90) days immediately preceding the date hereof).
- 6. That the Shareholder is not an issuer, dealer, or underwriter.
- 7. That none of the Shares were or are subject to any stop-order or any agreement granting any pledge, lien, mortgage, hypothecation, security interest, charge, option, encumbrance, or lock up.

We have assumed: (a) that the documents provided and referenced herein (collectively, the "Documents") have been duly authorized, executed and delivered by the parties thereto, (b) that the Documents constitute legally valid and binding obligations of the parties thereto, enforceable against each of them in accordance with their respective terms, and (c) that the status of the Documents as legally valid and binding obligation of the parties in not affected by any (i) breaches of, or defaults under, agreements or instruments, (ii) violations of statutes, rules, regulation, or court or governmental orders, or (iii) failures to obtain required consents, approvals or authorizations from, or make required registration, declaration, or filings with, governmental authorities.

Further, we have assumed the genuineness of the signatures both manual and conformed and electronic, the authenticity of the Documents, the conformity of copies of documents with originals, and the correctness of facts set forth therein.

Our opinions are subject to: (a) the effect of bankruptcy, insolvency, reorganization, fraudulent transfer, moratorium or other similar laws relating to or affecting the rights and remedies of creditors; (b) the effect of general principles of equity, whether considered in a proceeding in equity or at law (including the possible unavailability of specific performance or injunctive

relief), concepts of materiality, reasonableness, good faith, and fair dealing, and the discretion of the court before which a proceeding therefor may be brought; (c) the invalidity under certain circumstances under law or court decisions of provision providing for the indemnification of or contribution to a party with respect to a liability where such indemnification or contribution is contrary to public policy; and (d) we express no opinion with respect to: (i) provisions for liquidated damages, default interest, late charges, monetary penalties, make-whole premiums or other economic remedies to the extent such provision are deemed to constitute a penalty, (ii) consents to, or restrictions upon, governing law, jurisdiction venue, arbitration, remedies or judicial relief, (iii) any provision requiring the payment of attorneys' fees, where such payment is contrary to law or public policy, (iv) advance waivers of claims, defenses, rights granted by law, or notice, opportunity for hearing, evidentiary requirements, statutes of limitation, trial by jury or at law, or other procedural rights, (v) waivers of broadly or vaguely stated rights, (vi) provisions for exclusivity, election or cumulation of rights or remedies, (vii) provision authorizing or validating conclusive or discretionary determination, (viii) proxies, powers, and trusts, (ix) provisions prohibiting, restricting, or requiring consent to assignment or transfer of any right or property and (x) the severability, if invalid, of provisions to the foregoing effect.

This opinion is expresses solely on the facts and assumptions set forth herein and is specifically limited to the investigation and examination stated and such other investigation as we deemed necessary. After such investigation, we know of no facts which lead us to conclude that any opinion or conclusion set forth above or below is not correct. The opinion expressed herein is given as of the date hereof and we disclaim any obligation to advise you of any change in any matter set forth herein.

Qualifications: This opinion does not provide a defense to a violation of the registration requirements insofar as Shareholder's sale is part of a plan or scheme to evade said requirements. For purposes of this opinion, We have been furnished with and have examined originals or copies, certified or otherwise identified to my satisfaction, of all such records of the Company, agreements and other instruments, certificates of officers and representatives of the Company, certificates of public officials and other documents as we have deemed it necessary to require as a basis for the opinions hereafter expressed regarding the Shares.

As to questions of fact material to such opinions, we have, where relevant facts were not independently established, relied upon certifications by principal officers of the entities involved including the Stock Transfer Agent(s), Shareholder, and/or the Company. We have made such further legal and actual examination and investigation, as we deem necessary for purposes of rendering the following opinion. This opinion is based expressly on the facts stated herein and may not be relied upon if other facts, not presently known to us, come to light. Opinion letters of counsel are not binding upon the SEC or the Courts, and to the extent that persons relying upon this letter may have knowledge of facts or circumstances that are contrary to those upon which this opinion is based, this opinion would not be applicable. We am admitted to practice law in the State of Florida. The opinions expressed above are limited to the Federal Law of the United States of America and no opinion is provided regarding any federal or state law not specifically referenced herein.

The opinions set forth herein are expressed as of the date hereof and remain valid so long as the documents, instruments, records, and certificates we have examined and relied upon as noted above, are unchanged and the assumptions we have made, as noted above, are valid. If any facts or documents are determined to be incorrect, misstated, or misrepresented, then the opinion or opinions expressed herein may not continue to be valid. Furthermore, we disclaim

any undertaking to advise you hereafter whether the same would, if now existing and known to this office, cause any change or modification herein.

This opinion may be relied upon by the named addressees above and the shares covered hereby for the sole and express purpose of registering transfer of the shares on behalf of the Shareholder in accordance herewith. This opinion may not be relied upon by any other party for any other purpose and may not be reproduced or distributed (except to governmental or regulatory agencies as required by regulation or law) without the prior written permission of named counsel.

Conclusion:

In summary, for the reasons described above, the 71,700,000 Shares may be issued without a restricted legend and sold pursuant to Section 4 of the Act.

Sincerely,

Kenneth C. Grace

Kenneth C. Grace., Esq.

cc: Dimitar Slavchev Savov via email to: dimitar.savov@ymail.com and to his agent(s) via email to: noblehouse90@outlook.com & cliffredekop@gmail.com

LASH WILCOX & GRACE PL

Attorneys and Counselors at Law

2202 WEST SHORE BLVD., STE. 200 TAMPA, FL33607 phone 813.639.4205 fax 813.639.7501 Direct Dial: 813.639.4206 kgrace@lashwilcoxandgrace.com www.willtrustkengrace.com

December 15, 2021

To: Empire Stock Transfer via email to info@empirestock.com

Re: Rule 4(a)(1) Opinion Letter for Mariya Stanislavova Radivoeva for Restrictive Legend Removal for 5,000,000 Shares of Common Restricted Enzolytics Inc. (ENZC) Stock

Dear Stock Transfer Agent Professional:

This office has been requested to render an opinion regarding the removal of the restrictive legend from a total of 5,000,000 shares (the "Shares") of common stock of Enzolytics Inc. (the "Company" or "ENZC") in the name of Mariya Stanislavova Radivoeva ("Shareholder").

Summary: The Shareholder acquired the Shares from the Company on 3/6/18. In the opinion of this office Shareholder is not an issuer, dealer or underwriter with respect to the sale of the Shares as outlined herein; therefore, the exemption in Section 4(a)(1) of the 1933 Securities Act ("Act") applies. As such, the 5,000,000 Shares may be issued without a restrictive legend, and they may be sold on the open market pursuant to Section 4 of the Act.

Background: On 3/6/18, the Company issued 5,000,000 Shares to Shareholder and did so by issuing 1 stock certificate [certificate number 4176]. Shareholder has held this certificate/the Shares ever since (for over 3 years).

Affiliate Status: Shareholder is not an affiliate (officer, director, manager, 10% or more Voting/Preferred Stockholder) of the Company at the time of the proposed sale, and as far as we can tell, has never been an affiliate of the Company.

Current Public Information: The Company is a non-reporting company. It has not filed anything with the SEC, and it has never filed any 10-Ks or 10-Qs. However, it has been filing reports and other documents in OTC Markets. There are several and recent quarterly reports on file as well as several and recent annual reports filed with OTC Markets. It also has also periodically filed various supplemental information, notifications and letters. There are letters on file from attorneys confirming that there is adequate current information available to the public. As such, there is adequate current public information available regarding the Company. Notwithstanding, a company's current public information is irrelevant for purposes of Rule 4(a)(1).

Shell Status: The Company is not currently a shell, and from what we have been able to determine, it was never a shell company since it has been Enzolytics Inc. However, before the

¹ There is no agreement that would serve as any type of source documentation for the Shares. Shareholder acquired the Shares because Shareholder was a shareholder and an investor in IMMB and, as is stated in the corporate disclosures, Shareholder was issued ENZC shares for services associated with the implementation of the strategy in Bulgaria.

Company was Enzolytics, it was known as: Immunotech Laboratories, Inc.- September 11, 2017; Eco-Petroleum Solutions, Inc.-November 16, 2012; Structural Enhancement Technologies Corp.- May 10, 2010; Extreme Mobile Coatings Worldwide Corp.- March 2, 2009; Extreme Mobile Coatings Corp., Ltd. -October 10, 2008; Falcon Media Services, Ltd.-November 24, 2004; T&T Homes Limited -July 28, 2004. And the Company was incorporated and domiciled in the United Kingdom from 2004 to 2009. Therefore, we cannot state for certain whether or not the Company was a former shell. We have made inquiries into the shell statuses of these predecessors; however, to date, we have not been able to confirm non-shell status. We may be able to make such a confirmation in the future. However, for now, we will treat the Company as is if one or more of its predecessors was a shell. In that the Company is a non-reporting or alternate reporting company and does not have three current 10-Qs and a 10-K on file with the SEC, it has not cured any former shell status. However, under Section 4(a)(1) of the Act, the Company's status as a shell is irrelevant.

Legal Analysis of the Relevant Sections and Specific Exemption at Issue: Section 5(a) of the Act prohibits the sale of unregistered securities. However, §4(a)(1) of the Act exempts certain transactions from the §5 registration requirement. Specifically, §4(a)(1) exempts "transactions by any person other than an issuer, underwriter, or dealer."

The Shareholder herein is not an "issuer" as defined by § 2(a)(4). The term "issuer" means every person who issues or proposes to issue any security; except that with respect to certificates of deposit, voting-trust certificates, or collateral-trust certificates, or with respect to certificates of interest or shares in an unincorporated investment trust not having a board of directors (or persons performing similar functions) or of the fixed, restricted management, or unit type, the term "issuer" means the person or persons performing the acts and assuming the duties of depositor or manager pursuant to the provisions of the trust or other agreement or instrument under which such securities are issued; except that in the case of an unincorporated association which provides by its articles for limited liability of any or all of its members, or in the case of a trust, committee, or other legal entity, the trustees or members thereof shall not be individually liable as issuers of any security issued by the association, trust, committee, or other legal entity; except that with respect to equipment-trust certificates or like securities, the term "issuer" means the person by whom the equipment or property is or is to be used; and except that with respect to fractional undivided interests in oil, gas, or other mineral rights, the term "issuer" means the owner of any such right or of any interest in such right (whether whole or fractional) who creates fractional interests therein for the purpose of public offering. Here, Shareholder is not an issuer since it is not the entity that issued the Shares. Further, Shareholder is not the Company, nor is he controlled by the Company. See $\S 2(a)(4)$.

Likewise, the Shareholder is not a "dealer" as defined by § 2(a)(12). See § 2(a)(12). The term "dealer" means any person who engages either for all or part of his time, directly or indirectly, as agent, broker, or principal, in the business of offering, buying, selling, or otherwise dealing or trading in securities issued by another person. Here, Shareholder does not deal or trade in securities issued by another person. Shareholder is retired, but used to be a consultant, a negotiator and a business owner of a biotechnology company. Shareholder is not in the business of buying and selling securities, directly or indirectly. And Shareholder is not licensed as a dealer. Therefore, Shareholder is not a dealer.

The critical issue in this instance is whether the Shareholder is an "underwriter" as defined by § 2(a)(11). The term "underwriter" means any person who has (1) **purchased** from an issuer with a view to, or (2) offers or sells for an issuer in connection with, the **distribution** of any security, or (3) participates or has a direct or indirect participation in any such undertaking, or

- (4) participates or has a participation in the direct or indirect underwriting of any such undertaking; but such term shall not include a person whose interest is limited to a commission from an underwriter or dealer not in excess of the usual and customary distributors' or sellers' commission. As used in this paragraph the term "issuer" shall include, in addition to an issuer, any person directly or indirectly controlling or controlled by the issuer, or any person under direct or indirect common control with the issuer. These four main parts of the definition make up the "four tests of underwriter status," which are detailed and addressed below.
- -Whether or not the seller purchased his or her securities from the issuer: The seller (the Shareholder) did not **purchase** the securities (the Shares) from the issuer (the Company). Regarding the Shares, Shareholder acquired them for his investment in the third party company and for his negotiation work, and as such, they were not purchased, and certainly not purchases as part of an IPO.
- -Whether or not the seller is offering or selling for the issuer: The seller (the Shareholder) did not and is not offering or selling the securities (the Shares) for the issuer (the Company).
- -Whether or not the seller participated or had a direct or indirect participation in any such **distribution**: The seller (the Shareholder) did not participate directly or otherwise in any distribution.
- -Whether or not the seller participated or had a participation in the direct or indirect underwriting of any such **distribution**: The seller (the Shareholder) did not participate directly or otherwise in any underwriting of any **distribution**.

And the person (the Shareholder) is not: (a) directly or indirectly controlling or controlled by the issuer (the Company) nor is he (b) under direct or indirect common control with the issuer (the Company).

First, distribution is not defined by the Act, but it is widely accepted that it means "public offering." Therefore, the first prong of the analysis is whether a nonpublic offering can be shown to have been made by the Company. In such a case, the possibilities are greatly diminished that a shareholder's subsequent sale of shares would be considered a distribution and that the shareholder would be deemed an underwriter.

Section 4(a)(2) of the Act, which is applicable to issuers, exempts from the registration requirements under the Act transactions by an issuer not involving a "public offering." In the determination of whether or not the issuance of the Shares was a "public offering," we look to the factors set out by the following publications:

- (a) SEC v. Ralston Purina Co., 346 U.S. 119 (1953);
- (b) Doran v Petroleum Management Corp., 545 F.2d 893, 900 (5th Cir. 1977);
- (c) Hill York Corp. v. American Int'l Franchises, Inc., 448 F.2d 680, 687-89 (5th Cir. 1971);
- (d) Securities Act Release No. 4552 (November 6, 1962).

These publications set out factors in determining whether an offering is public or private, including: (1) the number of offerees and their relationship to each other and to the issuer, (2) the number of units offered, (3) the size of the offering, and (4) the manner of the offering. We also look to the factors set forth in *Cook v. Avien, Inc.*, 572 F.2d 685, 691 (1st Cir. 1978) (Holding that sales may be exempted if private offering is made in which purchasers are limited in number, are sophisticated, have a relationship with the issuer enabling them to command

access to information that would otherwise be contained in a reg. statement.).

Regarding the Shares, they were issued as part of a private transaction not a public offering. The shares were issued to Shareholder for his investment in the third party company and for his negotiation work. And the manner of the offering was private not public. This leads us to conclude that the transaction at issue did not amount to a public offering, and as such, not a distribution.

Second, a factor to be analyzed is whether or not the Shares were acquired with an intent to distribute or of they came to rest with the Shareholder. Here, they were not. Consider the following:

Over the years, interested persons and entities looked at the amount of time a shareholder held the securities in order to ascertain whether they were acquired with an intent to distribute or whether they came to rest. And since intent is difficult to establish and prove, interested persons and entities looked to other sections in the Act in order to fashion a test. At that time, years ago, the safe harbor in Rule 144 was two (2) years. Before 2008, under Rule 4(a)(1), two (2) years was generally the amount of time the shareholder had to hold the shares in order to be able to state that the shares were not acquired with a view toward distribution and instead came to rest with the shareholder. The seminal cases before 2008 were *U.S. v. Sherwood*, 175 F. Supp. 480, 483 (1959) and *Ackerberg v. Johnson*, 892 F.2d 1328 (1989). This two (2) year rule of thumb was based on the SEC's safe harbor provision under Rule 144, which at that time, was two (2) years.

However, since *Sherwood* and *Ackerberg*, the Act was amended. On 2/15/08, the adopted amendments to Rule 144 and Rule 145 of the Securities Act took effect and were implemented to increase the liquidity of privately sold securities and securities acquired in business combinations by giving holders the ability to resell those securities more rapidly without registration under the Securities Act. Amongst other amendments, the Rule 144 amendments shortened the holding period for the resale of restricted securities of reporting companies under this safe harbor from six (6) month holding period for securities issued by a reporting company current and in good standing with the SEC held by a non-affiliate, and a <u>one (1) year holding period otherwise</u>.

Since the 4(a)(1) holding period "rule of thumb" was based on the safe harbor of Rule 144, arguably once Rule 144 was amended, the holding period "rule of thumb" under Rule 4(a)(1) moved from two (2) years to at one (1) year. And while this change under Rule 4(a)(1) was not formalized, many attorneys and scholars have picked up on the amendment and resulting connection and change and are reaching the conclusion that a shareholder who holds stock for a year does implicate the requisite lack of intent to distribute and finding that the stock did come to rest with that shareholder.

Here, Shareholder has held all of the Shares since 3/6/18, which is when the stock certificates were issued. Therefore, the Shareholder has held the Shares for over two (2) years. And in light of the 2008 amendment to the Act and the argument above, which others have made and with which we agree, we reach the conclusion that the Shares were not acquired with a view toward distribution and instead came to rest with the Shareholder.

Based on the foregoing and in particular, the plain language of the Act and the body of regulations, article, and cases interpreting the Act, in our opinion, Shareholder is not an underwriter. Therefore, Section 4(a)(1) exempts the transaction from the Section 5 registration

requirement at issue.

Disclaimer:

As counsel, we have examined facts and questions of law as we have considered appropriate for purposes of this letter. In preparation of a prior letter on this matter, we have relied upon assurances of our client and his agents and representatives, the officers of the Company, and others as well as all reports filed with the SEC in compliance with the Act without having independently verified such factual matters. We are and OTC Markets pining herein as to the federal securities laws, and we express no opinion with respect to the applicability thereto, or the effect thereon, of the laws of any other jurisdiction or as to any matters of municipal law or the laws of legal agencies within a state.

We have relied upon the following additional information in rendering our opinion:

- 1. That the information provided to us by the Shareholder referenced herein and that it is true and correct.
- 2. That the information the Company disseminated to the SEC, OTC Markets, and the public, and that it was true and correct and timely.
- 3. That the Shareholder did in fact acquire the stock at issue for sufficient consideration as represented.
- 4. That the Shareholder is the true and valid holder of the Shares.
- 5. That the Shareholder is not and was not: an officer, director, owner of ten percent (10%) or more of the outstanding capital stock of the Company or is otherwise in a controlling position with, or an affiliate of, the Company (nor been so designated during the ninety (90) days immediately preceding the date hereof).
- 6. That the Shareholder is not an issuer, dealer, or underwriter.
- 7. That none of the Shares were or are subject to any stop-order or any agreement granting any pledge, lien, mortgage, hypothecation, security interest, charge, option, encumbrance, or lock up.

We have assumed: (a) that the documents provided and referenced herein (collectively, the "Documents") have been duly authorized, executed and delivered by the parties thereto, (b) that the Documents constitute legally valid and binding obligations of the parties thereto, enforceable against each of them in accordance with their respective terms, and (c) that the status of the Documents as legally valid and binding obligation of the parties in not affected by any (i) breaches of, or defaults under, agreements or instruments, (ii) violations of statutes, rules, regulation, or court or governmental orders, or (iii) failures to obtain required consents, approvals or authorizations from, or make required registration, declaration, or filings with, governmental authorities.

Further, we have assumed the genuineness of the signatures both manual and conformed and electronic, the authenticity of the Documents, the conformity of copies of documents with originals, and the correctness of facts set forth therein.

Our opinions are subject to: (a) the effect of bankruptcy, insolvency, reorganization, fraudulent transfer, moratorium or other similar laws relating to or affecting the rights and remedies of creditors; (b) the effect of general principles of equity, whether considered in a proceeding in equity or at law (including the possible unavailability of specific performance or injunctive relief), concepts of materiality, reasonableness, good faith, and fair dealing, and the discretion of the court before which a proceeding therefor may be brought; (c) the invalidity under certain circumstances under law or court decisions of provision providing for the indemnification of

or contribution to a party with respect to a liability where such indemnification or contribution is contrary to public policy; and (d) we express no opinion with respect to: (i) provisions for liquidated damages, default interest, late charges, monetary penalties, make-whole premiums or other economic remedies to the extent such provision are deemed to constitute a penalty, (ii) consents to, or restrictions upon, governing law, jurisdiction venue, arbitration, remedies or judicial relief, (iii) any provision requiring the payment of attorneys' fees, where such payment is contrary to law or public policy, (iv) advance waivers of claims, defenses, rights granted by law, or notice, opportunity for hearing, evidentiary requirements, statutes of limitation, trial by jury or at law, or other procedural rights, (v) waivers of broadly or vaguely stated rights, (vi) provisions for exclusivity, election or cumulation of rights or remedies, (vii) provision authorizing or validating conclusive or discretionary determination, (viii) proxies, powers, and trusts, (ix) provisions prohibiting, restricting, or requiring consent to assignment or transfer of any right or property and (x) the severability, if invalid, of provisions to the foregoing effect.

This opinion is expresses solely on the facts and assumptions set forth herein and is specifically limited to the investigation and examination stated and such other investigation as we deemed necessary. After such investigation, we know of no facts which lead us to conclude that any opinion or conclusion set forth above or below is not correct. The opinion expressed herein is given as of the date hereof and we disclaim any obligation to advise you of any change in any matter set forth herein.

Qualifications: This opinion does not provide a defense to a violation of the registration requirements insofar as Shareholder's sale is part of a plan or scheme to evade said requirements. For purposes of this opinion, We have been furnished with and have examined originals or copies, certified or otherwise identified to my satisfaction, of all such records of the Company, agreements and other instruments, certificates of officers and representatives of the Company, certificates of public officials and other documents as we have deemed it necessary to require as a basis for the opinions hereafter expressed regarding the Shares.

As to questions of fact material to such opinions, we have, where relevant facts were not independently established, relied upon certifications by principal officers of the entities involved including the Stock Transfer Agent(s), Shareholder, and/or the Company. We have made such further legal and actual examination and investigation, as we deem necessary for purposes of rendering the following opinion. This opinion is based expressly on the facts stated herein and may not be relied upon if other facts, not presently known to us, come to light. Opinion letters of counsel are not binding upon the SEC or the Courts, and to the extent that persons relying upon this letter may have knowledge of facts or circumstances that are contrary to those upon which this opinion is based, this opinion would not be applicable. We am admitted to practice law in the State of Florida. The opinions expressed above are limited to the Federal Law of the United States of America and no opinion is provided regarding any federal or state law not specifically referenced herein.

The opinions set forth herein are expressed as of the date hereof and remain valid so long as the documents, instruments, records, and certificates we have examined and relied upon as noted above, are unchanged and the assumptions we have made, as noted above, are valid. If any facts or documents are determined to be incorrect, misstated, or misrepresented, then the opinion or opinions expressed herein may not continue to be valid. Furthermore, we disclaim any undertaking to advise you hereafter whether the same would, if now existing and known to this office, cause any change or modification herein.

This opinion may be relied upon by the named addressees above and the shares covered hereby for the sole and express purpose of registering transfer of the shares on behalf of the Shareholder in accordance herewith. This opinion may not be relied upon by any other party for any other purpose and may not be reproduced or distributed (except to governmental or regulatory agencies as required by regulation or law) without the prior written permission of named counsel.

Conclusion:

In summary, for the reasons described above, the 5,000,000 Shares may be issued without a restricted legend and sold pursuant to Section 4 of the Act.

Sincerely,

Kenneth C. Grave

Kenneth C. Grace., Esq.

cc: Mariya Stanislavova Radivoeva email to: mradivoeva@yahoo.com and to her agent(s) via email to: dimitar.savov@ymail.com; cliffredekop@gmail.com noblehouse90@outlook.com

LASH WILCOX & GRACE PL

Attorneys and Counselors at Law

2202 WEST SHORE BLVD., STE. 200 TAMPA, FL33607 phone 813.639.4205 fax 813.639.7501 Direct Dial: 813.639.4206 kgrace@lashwilcoxandgrace.com www.willtrustkengrace.com

December 15, 2021

To: Empire Stock Transfer via email to info@empirestock.com

Re: Rule 4(a)(1) Opinion Letter for Daniel Antonov Valchanov for Restrictive Legend Removal for 3,050,000 Shares of Common Restricted Enzolytics Inc. (ENZC) Stock

Dear Stock Transfer Agent Professional:

This office has been requested to render an opinion regarding the removal of the restrictive legend from a total of 3,050,000 shares (the "Shares") of common stock of Enzolytics Inc. (the "Company" or "ENZC") in the name of Daniel Antonov Valchanov ("Shareholder").

Summary: The Shareholder acquired the Shares from the Company on 3/6/18. In the opinion of this office Shareholder is not an issuer, dealer or underwriter with respect to the sale of the Shares as outlined herein; therefore, the exemption in Section 4(a)(1) of the 1933 Securities Act ("Act") applies. As such, the 3,050,000 Shares may be issued without a restrictive legend, and they may be sold on the open market pursuant to Section 4 of the Act.

Background: On 3/6/18, the Company issued 3,050,000 Shares to Shareholder and did so by issuing 1 stock certificate [certificate number 4127]. Shareholder has held this certificate/the Shares ever since (for over 3 years).

Affiliate Status: Shareholder is not an affiliate (officer, director, manager, 10% or more Voting/Preferred Stockholder) of the Company at the time of the proposed sale, and as far as we can tell, has never been an affiliate of the Company.

Current Public Information: The Company is a non-reporting company. It has not filed anything with the SEC, and it has never filed any 10-Ks or 10-Qs. However, it has been filing reports and other documents in OTC Markets. There are several and recent quarterly reports on file as well as several and recent annual reports filed with OTC Markets. It also has also periodically filed various supplemental information, notifications and letters. There are letters on file from attorneys confirming that there is adequate current information available to the public. As such, there is adequate current public information available regarding the Company. Notwithstanding, a company's current public information is irrelevant for purposes of Rule 4(a)(1).

Shell Status: The Company is not currently a shell, and from what we have been able to determine, it was never a shell company since it has been Enzolytics Inc. However, before the

¹There is no agreement that would serve as any type of source documentation for the Shares. Shareholder acquired the Shares because Shareholder was a shareholder and an investor in IMMB and, as is stated in the corporate disclosures, Shareholder was issued ENZC shares for services associated with the implementation of the strategy in Bulgaria.

Company was Enzolytics, it was known as: Immunotech Laboratories, Inc.- September 11, 2017; Eco-Petroleum Solutions, Inc.-November 16, 2012; Structural Enhancement Technologies Corp.- May 10, 2010; Extreme Mobile Coatings Worldwide Corp.- March 2, 2009; Extreme Mobile Coatings Corp., Ltd. -October 10, 2008; Falcon Media Services, Ltd.-November 24, 2004; T&T Homes Limited -July 28, 2004. And the Company was incorporated and domiciled in the United Kingdom from 2004 to 2009. Therefore, we cannot state for certain whether or not the Company was a former shell. We have made inquiries into the shell statuses of these predecessors; however, to date, we have not been able to confirm non-shell status. We may be able to make such a confirmation in the future. However, for now, we will treat the Company as is if one or more of its predecessors was a shell. In that the Company is a non-reporting or alternate reporting company and does not have three current 10-Qs and a 10-K on file with the SEC, it has not cured any former shell status. However, under Section 4(a)(1) of the Act, the Company's status as a shell is irrelevant.

Legal Analysis of the Relevant Sections and Specific Exemption at Issue: Section 5(a) of the Act prohibits the sale of unregistered securities. However, §4(a)(1) of the Act exempts certain transactions from the §5 registration requirement. Specifically, §4(a)(1) exempts "transactions by any person other than an issuer, underwriter, or dealer."

The Shareholder herein is not an "issuer" as defined by § 2(a)(4). The term "issuer" means every person who issues or proposes to issue any security; except that with respect to certificates of deposit, voting-trust certificates, or collateral-trust certificates, or with respect to certificates of interest or shares in an unincorporated investment trust not having a board of directors (or persons performing similar functions) or of the fixed, restricted management, or unit type, the term "issuer" means the person or persons performing the acts and assuming the duties of depositor or manager pursuant to the provisions of the trust or other agreement or instrument under which such securities are issued; except that in the case of an unincorporated association which provides by its articles for limited liability of any or all of its members, or in the case of a trust, committee, or other legal entity, the trustees or members thereof shall not be individually liable as issuers of any security issued by the association, trust, committee, or other legal entity; except that with respect to equipment-trust certificates or like securities, the term "issuer" means the person by whom the equipment or property is or is to be used; and except that with respect to fractional undivided interests in oil, gas, or other mineral rights, the term "issuer" means the owner of any such right or of any interest in such right (whether whole or fractional) who creates fractional interests therein for the purpose of public offering. Here, Shareholder is not an issuer since it is not the entity that issued the Shares. Further, Shareholder is not the Company, nor is he controlled by the Company. See $\S 2(a)(4)$.

Likewise, the Shareholder is not a "dealer" as defined by § 2(a)(12). See § 2(a)(12). The term "dealer" means any person who engages either for all or part of his time, directly or indirectly, as agent, broker, or principal, in the business of offering, buying, selling, or otherwise dealing or trading in securities issued by another person. Here, Shareholder does not deal or trade in securities issued by another person. Shareholder is retired, but used to be a consultant, a negotiator and a business owner of a biotechnology company. Shareholder is not in the business of buying and selling securities, directly or indirectly. And Shareholder is not licensed as a dealer. Therefore, Shareholder is not a dealer.

The critical issue in this instance is whether the Shareholder is an "underwriter" as defined by § 2(a)(11). The term "underwriter" means any person who has (1) **purchased** from an issuer with a view to, or (2) offers or sells for an issuer in connection with, the **distribution** of any security, or (3) participates or has a direct or indirect participation in any such undertaking, or

- (4) participates or has a participation in the direct or indirect underwriting of any such undertaking; but such term shall not include a person whose interest is limited to a commission from an underwriter or dealer not in excess of the usual and customary distributors' or sellers' commission. As used in this paragraph the term "issuer" shall include, in addition to an issuer, any person directly or indirectly controlling or controlled by the issuer, or any person under direct or indirect common control with the issuer. These four main parts of the definition make up the "four tests of underwriter status," which are detailed and addressed below.
- -Whether or not the seller purchased his or her securities from the issuer: The seller (the Shareholder) did not **purchase** the securities (the Shares) from the issuer (the Company). Regarding the Shares, Shareholder acquired them for his investment in the third party company and for his negotiation work, and as such, they were not purchased, and certainly not purchases as part of an IPO.
- -Whether or not the seller is offering or selling for the issuer: The seller (the Shareholder) did not and is not offering or selling the securities (the Shares) for the issuer (the Company).
- -Whether or not the seller participated or had a direct or indirect participation in any such **distribution**: The seller (the Shareholder) did not participate directly or otherwise in any distribution.
- -Whether or not the seller participated or had a participation in the direct or indirect underwriting of any such **distribution**: The seller (the Shareholder) did not participate directly or otherwise in any underwriting of any **distribution**.

And the person (the Shareholder) is not: (a) directly or indirectly controlling or controlled by the issuer (the Company) nor is he (b) under direct or indirect common control with the issuer (the Company).

First, distribution is not defined by the Act, but it is widely accepted that it means "public offering." Therefore, the first prong of the analysis is whether a nonpublic offering can be shown to have been made by the Company. In such a case, the possibilities are greatly diminished that a shareholder's subsequent sale of shares would be considered a distribution and that the shareholder would be deemed an underwriter.

Section 4(a)(2) of the Act, which is applicable to issuers, exempts from the registration requirements under the Act transactions by an issuer not involving a "public offering." In the determination of whether or not the issuance of the Shares was a "public offering," we look to the factors set out by the following publications:

- (a) SEC v. Ralston Purina Co., 346 U.S. 119 (1953);
- (b) *Doran v Petroleum Management Corp.*, 545 F.2d 893, 900 (5th Cir. 1977);
- (c) Hill York Corp. v. American Int'l Franchises, Inc., 448 F.2d 680, 687-89 (5th Cir. 1971);
- (d) Securities Act Release No. 4552 (November 6, 1962).

These publications set out factors in determining whether an offering is public or private, including: (1) the number of offerees and their relationship to each other and to the issuer, (2) the number of units offered, (3) the size of the offering, and (4) the manner of the offering. We also look to the factors set forth in *Cook v. Avien, Inc.*, 572 F.2d 685, 691 (1st Cir. 1978) (Holding that sales may be exempted if private offering is made in which purchasers are limited in number, are sophisticated, have a relationship with the issuer enabling them to command

access to information that would otherwise be contained in a reg. statement.).

Regarding the Shares, they were issued as part of a private transaction not a public offering. The shares were issued to Shareholder for his investment in the third party company and for his negotiation work. And the manner of the offering was private not public. This leads us to conclude that the transaction at issue did not amount to a public offering, and as such, not a distribution.

Second, a factor to be analyzed is whether or not the Shares were acquired with an intent to distribute or of they came to rest with the Shareholder. Here, they were not. Consider the following:

Over the years, interested persons and entities looked at the amount of time a shareholder held the securities in order to ascertain whether they were acquired with an intent to distribute or whether they came to rest. And since intent is difficult to establish and prove, interested persons and entities looked to other sections in the Act in order to fashion a test. At that time, years ago, the safe harbor in Rule 144 was two (2) years. Before 2008, under Rule 4(a)(1), two (2) years was generally the amount of time the shareholder had to hold the shares in order to be able to state that the shares were not acquired with a view toward distribution and instead came to rest with the shareholder. The seminal cases before 2008 were *U.S. v. Sherwood*, 175 F. Supp. 480, 483 (1959) and *Ackerberg v. Johnson*, 892 F.2d 1328 (1989). This two (2) year rule of thumb was based on the SEC's safe harbor provision under Rule 144, which at that time, was two (2) years.

However, since *Sherwood* and *Ackerberg*, the Act was amended. On 2/15/08, the adopted amendments to Rule 144 and Rule 145 of the Securities Act took effect and were implemented to increase the liquidity of privately sold securities and securities acquired in business combinations by giving holders the ability to resell those securities more rapidly without registration under the Securities Act. Amongst other amendments, the Rule 144 amendments shortened the holding period for the resale of restricted securities of reporting companies under this safe harbor from six (6) month holding period for securities issued by a reporting company current and in good standing with the SEC held by a non-affiliate, and a <u>one (1) year holding period otherwise</u>.

Since the 4(a)(1) holding period "rule of thumb" was based on the safe harbor of Rule 144, arguably once Rule 144 was amended, the holding period "rule of thumb" under Rule 4(a)(1) moved from two (2) years to at one (1) year. And while this change under Rule 4(a)(1) was not formalized, many attorneys and scholars have picked up on the amendment and resulting connection and change and are reaching the conclusion that a shareholder who holds stock for a year does implicate the requisite lack of intent to distribute and finding that the stock did come to rest with that shareholder.

Here, Shareholder has held all of the Shares since 3/6/18, which is when the stock certificates were issued. Therefore, the Shareholder has held the Shares for over two (2) years. And in light of the 2008 amendment to the Act and the argument above, which others have made and with which we agree, we reach the conclusion that the Shares were not acquired with a view toward distribution and instead came to rest with the Shareholder.

Based on the foregoing and in particular, the plain language of the Act and the body of regulations, article, and cases interpreting the Act, in our opinion, Shareholder is not an underwriter. Therefore, Section 4(a)(1) exempts the transaction from the Section 5 registration

requirement at issue.

Disclaimer:

As counsel, we have examined facts and questions of law as we have considered appropriate for purposes of this letter. In preparation of a prior letter on this matter, we have relied upon assurances of our client and his agents and representatives, the officers of the Company, and others as well as all reports filed with the SEC in compliance with the Act without having independently verified such factual matters. We are and OTC Markets pining herein as to the federal securities laws, and we express no opinion with respect to the applicability thereto, or the effect thereon, of the laws of any other jurisdiction or as to any matters of municipal law or the laws of legal agencies within a state.

We have relied upon the following additional information in rendering our opinion:

- 1. That the information provided to us by the Shareholder referenced herein and that it is true and correct.
- 2. That the information the Company disseminated to the SEC, OTC Markets, and the public, and that it was true and correct and timely.
- 3. That the Shareholder did in fact acquire the stock at issue for sufficient consideration as represented.
- 4. That the Shareholder is the true and valid holder of the Shares.
- 5. That the Shareholder is not and was not: an officer, director, owner of ten percent (10%) or more of the outstanding capital stock of the Company or is otherwise in a controlling position with, or an affiliate of, the Company (nor been so designated during the ninety (90) days immediately preceding the date hereof).
- 6. That the Shareholder is not an issuer, dealer, or underwriter.
- 7. That none of the Shares were or are subject to any stop-order or any agreement granting any pledge, lien, mortgage, hypothecation, security interest, charge, option, encumbrance, or lock up.

We have assumed: (a) that the documents provided and referenced herein (collectively, the "Documents") have been duly authorized, executed and delivered by the parties thereto, (b) that the Documents constitute legally valid and binding obligations of the parties thereto, enforceable against each of them in accordance with their respective terms, and (c) that the status of the Documents as legally valid and binding obligation of the parties in not affected by any (i) breaches of, or defaults under, agreements or instruments, (ii) violations of statutes, rules, regulation, or court or governmental orders, or (iii) failures to obtain required consents, approvals or authorizations from, or make required registration, declaration, or filings with, governmental authorities.

Further, we have assumed the genuineness of the signatures both manual and conformed and electronic, the authenticity of the Documents, the conformity of copies of documents with originals, and the correctness of facts set forth therein.

Our opinions are subject to: (a) the effect of bankruptcy, insolvency, reorganization, fraudulent transfer, moratorium or other similar laws relating to or affecting the rights and remedies of creditors; (b) the effect of general principles of equity, whether considered in a proceeding in equity or at law (including the possible unavailability of specific performance or injunctive relief), concepts of materiality, reasonableness, good faith, and fair dealing, and the discretion of the court before which a proceeding therefor may be brought; (c) the invalidity under certain circumstances under law or court decisions of provision providing for the indemnification of

or contribution to a party with respect to a liability where such indemnification or contribution is contrary to public policy; and (d) we express no opinion with respect to: (i) provisions for liquidated damages, default interest, late charges, monetary penalties, make-whole premiums or other economic remedies to the extent such provision are deemed to constitute a penalty, (ii) consents to, or restrictions upon, governing law, jurisdiction venue, arbitration, remedies or judicial relief, (iii) any provision requiring the payment of attorneys' fees, where such payment is contrary to law or public policy, (iv) advance waivers of claims, defenses, rights granted by law, or notice, opportunity for hearing, evidentiary requirements, statutes of limitation, trial by jury or at law, or other procedural rights, (v) waivers of broadly or vaguely stated rights, (vi) provisions for exclusivity, election or cumulation of rights or remedies, (vii) provision authorizing or validating conclusive or discretionary determination, (viii) proxies, powers, and trusts, (ix) provisions prohibiting, restricting, or requiring consent to assignment or transfer of any right or property and (x) the severability, if invalid, of provisions to the foregoing effect.

This opinion is expresses solely on the facts and assumptions set forth herein and is specifically limited to the investigation and examination stated and such other investigation as we deemed necessary. After such investigation, we know of no facts which lead us to conclude that any opinion or conclusion set forth above or below is not correct. The opinion expressed herein is given as of the date hereof and we disclaim any obligation to advise you of any change in any matter set forth herein.

Qualifications: This opinion does not provide a defense to a violation of the registration requirements insofar as Shareholder's sale is part of a plan or scheme to evade said requirements. For purposes of this opinion, We have been furnished with and have examined originals or copies, certified or otherwise identified to my satisfaction, of all such records of the Company, agreements and other instruments, certificates of officers and representatives of the Company, certificates of public officials and other documents as we have deemed it necessary to require as a basis for the opinions hereafter expressed regarding the Shares.

As to questions of fact material to such opinions, we have, where relevant facts were not independently established, relied upon certifications by principal officers of the entities involved including the Stock Transfer Agent(s), Shareholder, and/or the Company. We have made such further legal and actual examination and investigation, as we deem necessary for purposes of rendering the following opinion. This opinion is based expressly on the facts stated herein and may not be relied upon if other facts, not presently known to us, come to light. Opinion letters of counsel are not binding upon the SEC or the Courts, and to the extent that persons relying upon this letter may have knowledge of facts or circumstances that are contrary to those upon which this opinion is based, this opinion would not be applicable. We am admitted to practice law in the State of Florida. The opinions expressed above are limited to the Federal Law of the United States of America and no opinion is provided regarding any federal or state law not specifically referenced herein.

The opinions set forth herein are expressed as of the date hereof and remain valid so long as the documents, instruments, records, and certificates we have examined and relied upon as noted above, are unchanged and the assumptions we have made, as noted above, are valid. If any facts or documents are determined to be incorrect, misstated, or misrepresented, then the opinion or opinions expressed herein may not continue to be valid. Furthermore, we disclaim any undertaking to advise you hereafter whether the same would, if now existing and known to this office, cause any change or modification herein.

Case 2:22-cv-00861-JAD-VCF Document 1 Filed 05/31/22 Page 48 of 159

This opinion may be relied upon by the named addressees above and the shares covered hereby for the sole and express purpose of registering transfer of the shares on behalf of the Shareholder in accordance herewith. This opinion may not be relied upon by any other party for any other purpose and may not be reproduced or distributed (except to governmental or regulatory agencies as required by regulation or law) without the prior written permission of named counsel.

Conclusion:

In summary, for the reasons described above, the 3,050,000 Shares may be issued without a restricted legend and sold pursuant to Section 4 of the Act.

Sincerely,

Kenneth C. Grace

Kenneth C. Grace., Esq.

cc: Daniel Antonov Valchanov via email to: D.Valchanov9@gmail.com and to his agent(s) via email to: dimitar.savov@ymail.com; cliffredekop@gmail.com noblehouse90@outlook.com

IRA EDSEL BRANHAM, P.L.L.C.

IRA E. BRANHAM, PLLC

Attorney and Counselor at Law
645 Hambley Blvd Pikeville, Kentucky 41501
phone 606-253-3032 fax 606-218-1092
irabranham6@gmail.com

January 11, 2022

To: Empire Stock Transfer via email to info@empirestock.com

Re: Rule 4(a)(1) Opinion Letter for Dimitar Slachev Savov for Restrictive Legend Removal for 71,700,000 Shares of Common Restricted Enzolytics Inc. (ENZC) Stock

Dear Stock Transfer Agent Professional:

This office has been requested to render an opinion regarding the removal of the restrictive legend from a total of 71,700,000 shares (the "Shares") of common stock of Enzolytics Inc. (the "Company" or "ENZC") in the name of Dimitar Slachev Savov. ("Shareholder").

Summary: The Shareholder acquired the Shares from the Company on 3/6/18. 1 In the opinion of this office Shareholder is not an issuer, dealer or underwriter with respect to the sale of the Shares as outlined herein; therefore, the exemption in Section 4(a)(1) of the 1933 Securities Act ("Act") applies. As such, the 71,700,000 Shares may be issued without a restrictive legend, and they may be sold on the open market pursuant to Section 4 of the Act.

Background: On 3/6/18, the Company issued 71,700,000 Shares to Shareholder and did so by issuing 52 stock certificates. See Account Statement, which contains all 52 stock certificate numbers and reflects the issuance of all Shares.

Affiliate Status: Shareholder is not an affiliate (officer, director, manager, 10% or more Voting/Preferred Stockholder) of the Company at the time of the proposed sale, and as far as we can tell, has never been an affiliate of the Company.

Current Public Information: The Company is a non-reporting company. It has not filed anything with the SEC, and it has never filed any 10-Ks or 10-Qs. However, it has been filing reports and other documents in OTC Markets. There are several and recent quarterly reports on file as well as several and recent annual reports filed with OTC Markets. It also has also periodically filed various supplemental

information, notifications and letters. There are letters on file from attorneys confirming that there is adequate current information available to the public. As such, there is adequate current public information available regarding the Company. Notwithstanding, a company's current public information is irrelevant for purposes of Rule 4(a)(1). 1

There is no agreement that would serve as any type of source documentation for the Shares. Shareholder owns the rights to the biotech technology in a Bulgarian LLC, and he was negotiating with between the Company (Enzolytics Inc. – ENZC – OTC Pink) and Immunotech Laboratories, Inc. (IMMB - OTC Pink) to gain a further interest in the technology. As a result of these negotiations, the Company issued to Shareholder the Shares, which was basically rewarding his ownership and investment in that other company and compensation for his efforts in the described negotiations. All IMMB shareholders were issued shares. The deal never closed between the two Companies, but Shareholder had earned the shares based on his good faith negotiations with ENZC.

Shell Status: The Company is not currently a shell, and from what we have been able to determine, it was never a shell company since it has been Enzolytics Inc. However, before the Company was Enzolytics, it was known as: Immunotech Laboratories, Inc.- September 11, 2017; Eco-Petroleum Solutions, Inc.-November 16, 2012; Structural Enhancement Technologies Corp.- May 10, 2010; Extreme Mobile Coatings Worldwide Corp.- March 2, 2009; Extreme Mobile Coatings Corp., Ltd.-October 10, 2008; Falcon Media Services, Ltd.- November 24, 2004; T&T Homes Limited -July 28, 2004. And the Company was incorporated and domiciled in the United Kingdom from 2004 to 2009. Therefore, we cannot state for certain whether or not the Company was a former shell. We have made inquiries into the shell statuses of these predecessors; however, to date, we have not been able to confirm non-shell status. We may be able to make such a confirmation in the future. However, for now, we will treat the Company as is if one or more of its predecessors was a shell. In that the Company is a non-reporting or alternate reporting company and does not have three current 10-Qs and a 10-K on file with the SEC, it has not cured any former shell status. However, under Section 4(a)(1) of the Act, the Company's status as a shell is irrelevant.

Legal Analysis of the Relevant Sections and Specific Exemption at Issue: Section5(a) of the Act prohibits the sale of unregistered securities. However, §4(a)(1) of the Act exempts certain transactions from the §5 registration requirement. Specifically, §4(a)(1) exempts "transactions by any person other than an issuer, underwriter, or dealer." The Shareholder herein is not an "issuer" as defined by § 2(a)(4). The term "issuer" means every person who issues or proposes to issue any security; except that with respect to certificates of deposit, voting-trust certificates, or collateral-trust certificates, or with respect to certificates of interest or shares in an unincorporated investment trust not having a board of directors (or persons performing similar functions) or of the fixed, restricted management, or unit type, the term "issuer" means the person or persons performing the acts and assuming the duties of depositor or manager pursuant to the provisions of the trust or other agreement or instrument under which such securities are issued; except that in the case of an unincorporated association which provides by its articles for limited liability of any or all of its members, or in the case of a trust, committee, or other legal entity, the trustees or members thereof shall not be individually liable as issuers of any security issued by the association, trust, committee, or other legal entity; except that with respect to equipmenttrust certificates or like securities, the term "issuer" means the person by whom the equipment or property is or is to be used; and except that with respect to fractional undivided interests in oil, gas, or other mineral rights, the term "issuer" means the owner of any such right or of any interest in such right

(whether whole or fractional) who creates fractional interests therein for the purpose of public offering. Here, Shareholder is not an issuer since it is not the entity that issued the Shares. Further, Shareholder is not the Company, nor is he controlled by the Company. See § 2(a)(4).

The critical issue in this instance is whether the Shareholder is an "underwriter" as defined by § 2(a)(11). The term "underwriter" means any person who has (1) purchased from an issuer with a view to, or (2) offers or sells for an issuer in connection with, the distribution of any security, or (3) participates or has a direct or indirect participation in any such undertaking, or (4) participates or has a participation in the direct or indirect underwriting of any such undertaking; but such term shall not include a person whose interest is limited to a commission from an underwriter or dealer not in excess of the usual and customary distributors' or sellers' commission. As used in this paragraph the term "issuer" shall include, in addition to an issuer, any person directly or indirectly controlling or controlled by the issuer, or any person under direct or indirect common control with the issuer. These four main parts of the definition make up the "four tests of underwriter status," which are detailed and addressed below.

- -Whether or not the seller purchased his or her securities from the issuer: The seller (the Shareholder) did not purchase the securities (the Shares) from the issuer (the Company). Regarding the Shares, Shareholder acquired them for his investment in the third party company and for his negotiation work, and as such, they were not purchased, and certainly not purchased, and certainly not purchases as part of an IPO.
- -Whether or not the seller is offering or selling for the issuer: The seller (the Shareholder) did not and is not offering or selling the securities (the Shares) for the issuer (the Company).
- -Whether or not the seller participated or had a direct or indirect participation in any such distribution: The seller (the Shareholder) did not participate directly or otherwise in any distribution.
- -Whether or not the seller participated or had a participation in the direct or indirect underwriting of any such distribution: The seller (the Shareholder) did not participate directly or otherwise in any underwriting of any distribution.

And the person (the Shareholder) is not: (a) directly or indirectly controlling or controlled by the issuer (the Company) nor is he (b) under direct or indirect common control with the issuer.

First, distribution is not defined by the Act, but it is widely accepted that it means "public offering." Therefore, the first prong of the analysis is whether a nonpublic offering can be shown to have been made by the Company. In such a case, the possibilities are greatly diminished that a shareholder's subsequent sale of shares would be considered a distribution and that the shareholder would be deemed an underwriter.

Section 4(a)(2) of the Act, which is applicable to issuers, exempts from the registration requirements under the Act transactions by an issuer not involving a "public offering." In the determination of whether or not the issuance of the Shares was a "public offering," we look to the factors set out by the following publications:

(a) SEC v. Ralston Purina Co., 346 U.S. 119 (1953);

- (b) Doran v Petroleum Management Corp., 545 F.2d 893, 900 (5th Cir. 1977);
- (c) Hill York Corp. v. American Int'l Franchises, Inc., 448 F.2d 680, 687-89 (5th Cir. 1971);
- (d) Securities Act Release No. 4552 (November 6, 1962).

These publications set out factors in determining whether an offering is public or private, including: (1) the number of offerees and their relationship to each other and to the issuer, (2) the number of units offered, (3) the size of the offering, and (4) the manner of the offering. We also look to the factors set forth in Cook v. Avien, Inc., 572 F.2d 685, 691 (1st Cir. 1978) (Holding that sales may be exempted if private offering is made in which purchasers are limited in number, are sophisticated, have a relationship with the issuer enabling them to command access to information that would otherwise be contained in a reg. statement.).

Regarding the Shares, they were issued as part of a private transaction not a public offering. The shares were issued to Shareholder for his investment in the third party company and for his negotiation work. And the manner of the offering was private not public. This leads us to conclude that the transaction at issue did not amount to a public offering, and as such, not a distribution.

Second, a factor to be analyzed is whether or not the Shares were acquired with an intent to distribute or of they came to rest with the Shareholder. Here, they were not. Consider the following:

Over the years, interested persons and entities looked at the amount of time a shareholder held the securities in order to ascertain whether they were acquired with an intent to distribute or whether they came to rest. And since intent is difficult to establish and prove, interested persons and entities looked to other sections in the Act in order to fashion a test. At that time, years ago, the safe harbor in Rule 144 was two (2) years. Before 2008, under Rule 4(a)(1), two (2) years was generally the amount of time the shareholder had to hold the shares in order to be able to state that the shares were not acquired with a view toward distribution and instead came to rest with the shareholder. The seminal cases before 2008 were U.S. v. Sherwood, 175 F. Supp. 480, 483 (1959) and Ackerberg v. Johnson, 892 F.2d 1328 (1989). This two (2) year rule of thumb was based on the SEC's safe harbor provision under Rule 144, which at that time, was two (2) years.

However, since Sherwood and Ackerberg, the Act was amended. On 2/15/08, the adopted amendments to Rule 144 and Rule 145 of the Securities Act took effect and were implemented to increase the liquidity of privately sold securities and securities acquired in business combinations by giving holders the ability to resell those securities more rapidly without registration under the Securities Act. Amongst other amendments, the Rule 144 amendments shortened the holding period for the resale of restricted securities of reporting companies under this safe harbor from six (6) month holding period for securities issued by a reporting company current and in good standing with the SEC held by a non-affiliate, and a one (1) year holding period otherwise.

Since the 4(a)(1) holding period "rule of thumb" was based on the safe harbor of Rule 144, arguably once Rule 144 was amended, the holding period "rule of thumb" under Rule 4(a)(1) moved from two (2) years to at one (1) year. And while this change under Rule 4(a)(1) was not formalized, many attorneys and scholars have picked up on the amendment and resulting connection and change and are reaching the conclusion that a shareholder who holds stock for a year does implicate the requisite lack of intent to distribute and finding that the stock did come to rest with that shareholder.

Here, Shareholder has held all of the Shares since 3/6/18, which is when the stock certificates were issued. Therefore, the Shareholder has held the Shares for over two (2) years. And in light of the 2008 amendment to the Act and the argument above, which others have made and with which we agree, we reach the conclusion that the Shares were not acquired with a view toward distribution and instead came to rest with the Shareholder.

Based on the foregoing and in particular, the plain language of the Act and the body of regulations, article, and cases interpreting the Act, in our opinion, Shareholder is not an underwriter. Therefore, Section 4(a)(1) exempts the transaction from the Section 5 registration.

Disclaimer:

As counsel, we have examined facts and questions of law as we have considered appropriate for purposes of this letter. In preparation of a prior letter on this matter, we have relied upon assurances of our client and his agents and representatives, the officers of the Company, and others as well as all reports filed with the SEC in compliance with the Act without having independently verified such factual matters. We are and OTC Markets pining herein as to the federal securities laws, and we express no opinion with respect to the applicability thereto, or the effect thereon, of the laws of any other jurisdiction or as to any matters of municipal law or the laws of legal agencies within a state.

We have relied upon the following additional information in rendering our opinion:

- 1. That the information provided to us by the Shareholder referenced herein and that it is true and correct.
- 2. That the information the Company disseminated to the SEC, OTC Markets, and the public, and that it was true and correct and timely.
- 3. That the Shareholder did in fact acquire the stock at issue for sufficient consideration as represented.
- 4. That the Shareholder is the true and valid holder of the Shares.
- 5. That the Shareholder is not and was not: an officer, director, owner of ten percent (10%) or more of the outstanding capital stock of the Company or is otherwise in a controlling position with, or an affiliate of, the Company (nor been so designated during the ninety (90) days immediately preceding the date hereof).
- 6. That the Shareholder is not an issuer, dealer, or underwriter.
- 7. That none of the Shares were or are subject to any stop-order or any agreement granting any pledge, lien, mortgage, hypothecation, security interest, charge, option, encumbrance, or lock up.

We have assumed: (a) that the documents provided and referenced herein (collectively, the "Documents") have been duly authorized, executed and delivered by the parties thereto, (b) that the Documents constitute legally valid and binding obligations of the parties thereto, enforceable against each of them in accordance with their respective terms, and (c) that the status of the Documents as legally valid and binding obligation of the parties in not affected by any (i) breaches of, or defaults

under, agreements or instruments, (ii) violations of statutes, rules, regulation, or court or governmental orders, or (iii) failures to obtain required consents, approvals or authorizations from, or make required registration, declaration, or filings with, governmental authorities.

Further, we have assumed the genuineness of the signatures both manual and conformed and electronic, the authenticity of the Documents, the conformity of copies of documents with originals, and the correctness of facts set forth therein.

Our opinions are subject to: (a) the effect of bankruptcy, insolvency, reorganization, fraudulent transfer, moratorium or other similar laws relating to or affecting the rights and remedies of creditors; (b) the effect of general principles of equity, whether considered in a proceeding in equity or at law (including the possible unavailability of specific performance or injunctive relief), concepts of materiality, reasonableness, good faith, and fair dealing, and the discretion of the court before which a proceeding therefor may be brought; (c) the invalidity under certain circumstances under law or court decisions of provision providing for the indemnification of or contribution to a party with respect to a liability where such indemnification or contribution is contrary to public policy; and (d) we express no opinion with respect to: (i) provisions for liquidated damages, default interest, late charges, monetary penalties, make-whole premiums or other economic remedies to the extent such provision are deemed to constitute a penalty, (ii) consents to, or restrictions upon, governing law, jurisdiction venue, arbitration, remedies or judicial relief, (iii) any provision requiring the payment of attorneys' fees, where such payment is contrary to law or public policy, (iv) advance waivers of claims, defenses, rights granted by law, or notice, opportunity for hearing, evidentiary requirements, statutes of limitation, trial by jury or at law, or other procedural rights, (v) waivers of broadly or vaguely stated rights, (vi) provisions for exclusivity, election or cumulation of rights or remedies, (vii) provision authorizing or validating conclusive or discretionary determination, (viii) proxies, powers, and trusts, (ix) provisions prohibiting, restricting, or requiring consent to assignment or transfer of any right or property and (x) the severability, if invalid, of provisions to the foregoing effect.

This opinion is expresses solely on the facts and assumptions set forth herein and is specifically limited to the investigation and examination stated and such other investigation as we deemed necessary. After such investigation, we know of no facts which lead us to conclude that any opinion or conclusion set forth above or below is not correct. The opinion expressed herein is given as of the date hereof and we disclaim any obligation to advise you of any change in any matter set forth herein.

Qualifications: This opinion does not provide a defense to a violation of the registration requirements insofar as Shareholder's sale is part of a plan or scheme to evade said requirements. For purposes of this opinion, We have been furnished with and have examined originals or copies, certified or otherwise identified to my satisfaction, of all such records of the Company, agreements and other instruments, certificates of officers and representatives of the Company, certificates of public officials and other documents as we have deemed it necessary to require as a basis for the opinions hereafter expressed regarding the Shares.

As to questions of fact material to such opinions, we have, where relevant facts were not independently established, relied upon certifications by principal officers of the entities involved including the Stock Transfer Agent(s), Shareholder, and/or the Company. We have made such further legal and actual examination and investigation, as we deem necessary for purposes of rendering the following opinion. This opinion is based expressly on the facts stated herein and may not be relied upon if other facts, not

presently known to us, come to light. Opinion letters of counsel are not binding upon the SEC or the Courts, and to the extent that persons relying upon this letter may have knowledge of facts or circumstances that are contrary to those upon which this opinion is based, this opinion would not be applicable. We am admitted to practice law in the State of Florida. The opinions expressed above are limited to the Federal Law of the United States of America and no opinion is provided regarding any federal or state law not specifically referenced herein.

The opinions set forth herein are expressed as of the date hereof and remain valid so long as the documents, instruments, records, and certificates we have examined and relied upon as noted above, are unchanged and the assumptions we have made, as noted above, are valid. If any facts or documents are determined to be incorrect, misstated, or misrepresented, then the opinion or opinions expressed herein may not continue to be valid. Furthermore, we disclaim any undertaking to advise you hereafter whether the same would, if now existing and known to this office, cause any change or modification herein.

This opinion may be relied upon by the named addressees above and the shares covered hereby for the sole and express purpose of registering transfer of the shares on behalf of the Shareholder in accordance herewith. This opinion may not be relied upon by any other party for any other purpose and may not be reproduced or distributed (except to governmental or regulatory agencies as required by regulation or law) without the prior written permission of named counsel.

Conclusion:

In summary, for the reasons described above, the 71,700,000 Shares may be issued without a restricted legend and sold pursuant to Section 4 of the Act.

Sincerely,

<u>Ira E. Branham</u>

EXHIBIT 5

Eco-Petroleum Solutions, Inc. Financial Statements

For the three months and years ending December 31, 2017 and December 31, 2016 (Unaudited)

ECO-PETROLEUM SOLUTIONS, INC. NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2017 and 2016 (Unaudited)

(8) Preferred Stock

On March 9, 2017, the Company created two new classes of Preferred Stock, 60,000,000 shares of Series A, authorized, and 465,000,000 shares of Series B, authorized.

As of December 31, 2017, and 2016, 60,000,000 and 0 shares, respectively, of the registrant's preferred stock-Series A, par value of \$0.0001, were issued and outstanding and 100,000,000 and 0 shares, respectively, of the registrant's preferred stock-Series B, par value of \$0.0001, were issued and outstanding.

(9) Subsequent Events

On October 29, 2017, The Company filed with FINRA a Notice of share exchange for its subsidiary Immunotech Laboratories. Inc. FINRA issued a deficiency letter on January 12, 2018 due to issues with one or more of its shareholders and the Corporate Action was closed. As a result, the Company's Corporate action filed in June of 2017 requesting the name change to Immunotech Laboratories, Inc. with FINRA was withdrawn.

On January 15, 2018 the merger agreement with Immunotech Laboratories, Inc. was terminated except for Section 1.03(d)(i) which relates to the appointment of Harry Zhabilov as Chairman and CEO of ECPO which remains in effect.

On January 17, 2018 the Company amended its articles of incorporation with the State of Delaware changing its name to Enzolytics, Inc. and increasing its authorized common stock from Six Hundred Million shares to Nine Hundred and Fifty Million shares.

On January 30, 2018 a new Corporate action was filed by the Company to change its name from Eco-Petroleum Solutions, Inc. to Enzolytics, Inc. to better represent the new business strategy. The Corporate action was approved on March 22nd and the ticker symbol was changed from ECPO to ENZC. The Articles of Incorporation in the state of Delaware were filed on January 17, of 2018 changing the name to Enzolytics, Inc.

On March 6, 2018 the company issued 223,695,000 shares as compensation to several individuals to further its efforts to pursue its strategic shift to the Drug Development Industry in Bulgaria and other Eastern European Countries.

On March 23, 2018 the Company issued 175,000,000 shares to the Zhabilov Trust in exchange for acknowledgement of the Asset Sale Transaction transferring the Exclusive License as well as acknowledging the assumption of the fee due for the license.

On March 28, 2018 an asset purchase agreement was entered into with Immunotech Laboratories, Inc whereby the Exclusive License Agreement for the Patented Immunotherapy Treatment for the care of HIV/Aids and Hepatitis C patients, Forty Nine Percent ownership in Immunotech Laboratories BG, all equipment and intellectual property associated with the Patented treatment in exchange for a note payable and common stock of Enzolytics, Inc. issued to Immunotech Laboratories, Inc. and assumption of certain debt from Immunotech by Enzolytics, Inc.

ISSUER INFORMATION AND DISCLOSURE STATEMENT PURSUANT TO Rule 15c2-11

ANNUAL REPORT

March 31, 2018

ENZOLYTICS, INC.

120 W. Pomona Avenue Monrovia, CA 91016 (626) 538-4779

Federal ID No.: <u>30-0808561</u> CUSIP No.: <u>294112107</u>

ISSUER'S EQUITY SECURITIES

Capital Stock

950,000,000 Shares of Common Stock authorized, par value \$0.0001 per share 520,248,470 common shares issued and outstanding as of March 31,2018 540,248,470 common shares issued and outstanding as of June 4, 2018

\$5,000 of debt and accrued interest acquired from Cimarron Capital Ltd.

On January 8, 2018 the Company issued under a subscription agreement 1,000,000 shares to A2 Carved in Stone, Inc.

On February 27, 2018 the Company issued 100,000 shares to Dr. Hongxiang Hui for compensation to Dr. Hui for services rendered under the Advisory Board consulting agreement.

On March 06,2018 the Company issued 3,050,000 common shares to Daniel Antonov Valchanoov for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 10,000,000 common shares to Vesselka Antonov Valchanov for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 10,000,000 common shares to Vesselka Miladinova Dimitrov for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 100,000,000 common shares to Mt Rose Corporation for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 10,000,000 common shares to Milen Valentinov Dimitrov for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 40,000 common shares to Mariya Stoyanova Angelova for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 45,000 common shares to Milen Vasilev Trichkov for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 20,000 common shares to Yavor Ivanov Rudarski for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 200,000 common shares to Rossen Hristov Iliev for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 50,000 common shares to Konstantin Georgiev Georgiev for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 750,000 common shares to Martin Lipkovsk for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 40,000 common shares to Konstantin Mihaylov Belchev for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 2,500,000 common shares to Kamelya Georgieva Tsoklinova for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 2,500,000 common shares to Lucezar Bogomilov Ivanov for services rendered in implementing the business strategy in Bulgaria.

On March 23,2018 the Company issued 78,400,000 common shares to Dimita Slachev Savov for services rendered in implementing the business strategy in Bulgaria.

On March 06,2018 the Company issued 5,000,000 common shares to Mariya Stanislavova Radivoeva for services rendered in implementing the business strategy in Bulgaria.

On March 23, 2018 the Company issued 175,000,000 common shares to Zhabilov Trust, Diana Zhabilov Trustee for

Item XI. Issuer's Certifications.

I, Harry H. Zhabilov. Director and Chief Executive Officer, certify that:

- 1. I have reviewed this Annual Report as of March 31,2018, of Enzolytics, Inc., a Delaware corporation; and,
- 2. Based on my knowledge, this disclosure statement does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, and is not misleading with respect to the period covered by this disclosure statement; and,
- 3. Based on my knowledge, the financial statements, and other financial information included or incorporated by reference in this disclosure statement, fairly represent in all material respects, the financial condition, results of operations and cash flows of the issuer as of, and for, the periods presented in this information and disclosure statement.

June 4, 2018

/s/ Harry H. Zhabilov

Harry H. Zhabilov

Chief Executive Officer, Chief Financial Officer and Sole Director

Disclosure Statement Pursuant to the Pink Basic Disclosure Guidelines

ENZOLYTICS, INC.

2000 North Central Expressway, Plano, TX	X 75074	
(072) 202 0414		

www.enzolytics.com

harry@enzolytics.com

SIC Code 541711

Year End Report
For the Period Ending: December 31, 2019
(the "Reporting Period")

As of December 31, 2019, the number of shares outstanding of our Common Stock was: 1.066,020,359

As of September 30, 2019, the number of shares outstanding of our Common Stock was: 970,033,359

As of December 31, 2018, the number of shares outstanding of our Common Stock was: 817,748,470

Indicate by check mark whether the company is a shell company (as defined in Rule 405 of the Securities Act of 1933 and Rule 12b-2 of the Exchange Act of 1934):

Yes:

No:

No:

No:

No:

Indicate by check mark whether the company's shell status has changed since the previous reporting period:

Yes:

No:

No:

Indicate by check mark whether a Change in Control¹ of the company has occurred over this reporting period:

No: ⊠

Yes:

^{1 &}quot;Change in Control" shall mean any events resulting in:

⁽i) Any "person" (as such term is used in Sections 13(d) and 14(d) of the Exchange Act) becoming the "beneficial owner" (as defined in Rule 13d-3 of the Exchange Act), directly or indirectly, of securities of the Company representing fifty percent (50%) or more of the total voting power represented by the Company's then outstanding voting securities:

⁽ii) The consummation of the sale or disposition by the Company of all or substantially all of the Company's assets:

⁽iii) A change in the composition of the Board occurring within a two (2)-year period, as a result of which fewer than a majority of the directors are directors immediately prior to such change; or

⁽iv) The consummation of a merger or consolidation of the Company with any other corporation, other than a merger or consolidation which would result in the voting securities of the Company outstanding immediately prior thereto continuing to represent (either by remaining outstanding or by being converted into voting securities of the surviving entity or its parent) at least fifty percent (50%) of the total voting power represented by the voting securities of the Company or such surviving entity or its parent outstanding immediately after such merger or consolidation.

Shares Outstanding a Year End:	s of Second Most	Recent Fiscal			3 1.71.				
rear End.	*Right-click the rows below and select "Insert" to add rows as needed.								
Date <u>12/31/2016</u>									
Date of Transaction	Transaction type (e.g. new issuance, cancellation, shares returned to treasury)	Number of Shares Issued (or cancelled)	Class of Securities	Value of shares issued (\$/per share) at Issuance	Were the shares issued at a discount to market price at the time of issuance? (Yes/No)	Individual/ Entity Shares were issued to (entities must have individual with voting / investment control disclosed).	Reason for share issuance (e.g. for cash or debt conversion) -OR-Nature of Services Provided	Restricted or Unrestricted as of this filing.	Exemption or Registration Type.
June 21, 2017	Issuance	9,414,312	Common	\$.00053	yes	Southridge Partners II, Steve Hicks	Debt Conversion	Unrestricted	Exemption
October 25, 2017	Issuance	500,000	Common	<u>.0001</u>	yes	Cimarron Capital LTD, Peter Aiello	Settlement	Unrestricted	Exemption
January 8 ,2018	Issuance	1,000,000	Common	.005	<u>yęs</u>	A2 Carved in Stone; Kevin Pla	Cash	Restricted	Registration
January 27, 2018	Issuance	100,000	Common	.0001	yes	Dr. Hongxiang Hui	Advisory Board	Restricted	Registration
March 6, 2018	issuance	3,050,000	Common	.0001	yes	Daniel Antonov Valchanoov	Consulting Services	Restricted	Registration
March 6, 2018	issuance	10,000,000	Common	.0001	уęs	Vesselka Antonov Valchanov	Consulting Services	Restricted	Registration
March 6, 2018	issuance	10.000,000	Common	<u>.0001</u>	yes	Vesselka Miladinova Dimitrov	Consulting Services	Restricted	Registration
March 6, 2018	issuance	100,000,000	Common	.0001	yes	Mt Rose Corporation Valentine Dimitrov	Consulting Services	Restricted	Registration
March 6, 2018	issuance	10,000,000	Common	.0001	<u>yeş</u>	Milen Valentinov Dimitrov	Consulting Services	Restricted	Registration
March 6, 2018	issuance	40.000	Common	.0001	<u>yes</u>	Mariya Stoyanova Angelova	Consulting Services	Restricted	Registration
March 6, 2018	issuance	45.000	Common	.0001	<u>yes</u>	Milen Vasilev Trichkov	Consulting Services	Restricted	Registration
March 6, 2018	issuance	20,000	Common	.0001	yes	Yavor Ivanov Rudarski	Consulting Services	Restricted	Registration
March 6, 2018	issuance	200,000	Common	.0001	yes	Rossen Hristov Iliev	Consulting Services	Restricted	Registration
March 6, 2018	ișsuance	50.000,	Common	.0001	yes	Konstantin Georgiev Georgiev	Consulting Services	Restricted	Registration
March 6, 2018	issuance	750,000	Common	.0001	yes	Martin Lipkov	Consulting Services	Restricted	Registration
March 6, 2018	issuance	40,000	Common	<u>.0001</u>	yes	Konstantin Mihaylov Belchev	Consulting Services	Restricted	Registration
March 6, 2018	issuance	2,500,000	Common	<u>.0001</u>	yes	Kamelya Georgieva Tsoklinova	Consulting Services	Restricted	Registration

March 6, 2018	<u>issuance</u>	2,500,000	Common	.0001	<u>yes</u>	Lucezar Bogomilov Ivanov	Consulting Services	Restricted	Registration
March 13, 2018	Issuance	50,000,000	Series A Preferred	.0001	<u>no</u>	Zhabilov Trust <u>Diana Zhabilov</u> <u>Trustee</u>	Acquisition	Restricted	Registration
March 13, 2018	Issuance	6,000,000	Series A Preferred	<u>.0001</u>	no	Phil Felizine	Acquisition	Restricted	Registration
March 13, 2018	Issuance	4,000.000	Series A Preferred	.0001	<u>no</u>	Harry Zhabilov	Acquisition	Restricted	Registration
March 23, 2018	Issuance	71,900,000	Common	.0001	yes	Dimita Slachev Savov	Consulting Services	Restricted	Registration
March 23, 2018	issuance	3.000.000	Common	.0001	<u>yes</u>	Volen Nikolov Siderov	Consulting Services	Restricted	Registration
March 23, 2018	issuance	3,500,000	Common	.0001	yeş	Denitsa S Siderova	Consulting Services	Restricted	Registration
March 6, 2018	Issuance	5,000,000	Common	.0001	yes	Mariya Stanislavova Radivoeva	Consulting Services	Restricted	Registration
March 23, 2018	Issuance	175,000,000	Common	.0001	yes	Zhabilov Trust, Diana Zhabilov Trustee	Consulting Services	Restricted	Registration
April 20, 2018	Issuance	4,000,000	Common	.0001	yes	A2 Carved in Stone; Kevin Pla	<u>Cash</u>	Restricted	Registration
May 25, 2018	Issuance	20,000,000	Common	.0001	yes	Luchezar Bogomilov	Consulting Services	Restricted	Registration
May 25, 2018	Issuance	20,000,000	Series B Preferred	.001	no	Seacor Capital Lisa Ficarra	Consulting Services	Restricted	Registration
July 18, 2018	Issuance	100,000,000	Common	<u>.0001</u>	yes	Zhabilov Trust, Diana Zhabilov Trustee	Consulting Services	Restricted	Registration
August 24, 2018	Issuance	137,000,000	Common	.0001	<u>yes</u>	Zhabilov Trust, Diana Zhabilov Trustee	Consulting Services	Restricted	Registration
August 28, 2018	Issuance	10,000,000	Common	.0001	yes	Francis De A S Moreno	Consulting Services	Restricted	Registration
August 28, 2018	Issuance	4,500,000	Common	.0001	yes	Cimarron Capital, Peter Aiello	Consulting Services	Restricted	Registration
September 5, 2018	Issuance	10,000,000	Common	.0001	yes	Adranik Bagdasarian	Consulting Services	Restricted	Registration
September 25, 2018	Issuance	10,000,000	Common	.0001	yes	Livingston Asset Management Henry Sargent	3(a)(10) Conversion	Restricted	Registration
October 11, 2018	Issuance	2,000,000	Common	.0096	No	Harutyan Eran	Consulting Services	Restricted	Registration
January 24, 2019	Issuançe	66,376,000	Common	.0001	yes	Livingston Asset Management Henry Sargent	3(a)(10) Conversion	Restricted	Registration
February 7, 2019	Issuance	72,660,000	Common	.0001	yes	Livingston Asset Management Henry Sargent	3(a)(10) Conversion	Restricted	Registration
February 12, 2019	Issuance	13,248,889	Common	.00038	yes	William Tynan	Debt Conversion	Restricted	Registration
December 6, 2019	Issuance	38.762,000	Common	.0001	yes	Livingston Asset Management Henry Sargent	3(a)(10) Conversion	Restricted	Registration

10) Issuer Certification

Principal Executive Officer:

The issuer shall include certifications by the chief executive officer and chief financial officer of the issuer (or any other persons with different titles but having the same responsibilities).

The certifications shall follow the format below:

- I, Charles Cotropia, certify that:
 - 1. I have reviewed this December 31, 2019 Year End Disclosure Statement of Enzolytics, Inc.;
 - 2. Based on my knowledge, this disclosure statement does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this disclosure statement; and
 - 3. Based on my knowledge, the financial statements, and other financial information included or incorporated by reference in this disclosure statement, fairly present in all material respects the financial condition, results of operations and cash flows of the issuer as of, and for, the periods presented in this disclosure statement.

January 11, 2021

/s/ Charles Cotropia, CEO

(Digital Signatures should appear as "/s/ [OFFICER NAME]")

Principal Financial Officer:

- I, Harry Zhabilov certify that:
 - 1. I have reviewed this this December 31, 2019 Year End Disclosure Statement of Enzolytics, Inc.;
 - 2. Based on my knowledge, this disclosure statement does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this disclosure statement; and
 - 3. Based on my knowledge, the financial statements, and other financial information included or incorporated by reference in this disclosure statement, fairly present in all material respects the financial condition, results of operations and cash flows of the issuer as of, and for, the periods presented in this disclosure statement.

January 11, 2021

/s/ Harry Zhabilov, CFO

(Digital Signatures should appear as "/s/ [OFFICER NAME]")

EXHIBIT 4

Fwd: Eco-Petroleum

From: Harry Zhabilov (zhabilov@att.net)

To: dimitar.savov@ymail.com

Date: Friday, March 16, 2018, 07:06 PM GMT+2

Begin forwarded message:

From: "Tiffany Baxter" < tiffany@natco.com>

Subject: Eco-Petroleum

Date: March 16, 2018 at 8:20:18 AM PDT To: "'Harry Zhabilov'" <<u>zhabilov@att.net</u>>

Hi Harry:

This email will serve as confirmation that the certificates 4127-4176 issued with Eco-Petroleum Solutions as the name of the company are valid on the books and records. The certificates do not list Immunotech Laboratories as the name of the Company as the name change is pending FINRA approval. Once the name change is approved, the certificates with Eco-Petroleum Solutions will still be valid and represent shares of Immunotech Laboratories

Best regards, Tiffany Baxter Transfer Agent Manager

Nevada Agency and Transfer Company 50 West Liberty Street, Suite 880 Reno NV 89501

Tel: 775-322-0626 Fax: 775-322-5623

PLEASE MAKE NOTE OF OUR NEW EMAIL AND WEBSITE:

Email: tiffany@natco.com Website: www.natco.com

THIS EMAIL AND ANY FILES TRANSMITTED WITH IT ARE PRIVILEGED, CONFIDENTIAL, SUBJECT TO COPYRIGHT AND INTENDED SOLELY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHOM THEY ARE ADDRESSED. ANY UNAUTHORIZED USE, COPYING, REVIEW OR DISCLOSURE IS PROHIBITED. PLEASE NOTIFY THE SENDER IMMEDIATELY IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR. THANK YOU FOR YOUR ASSISTANCE AND CO-OPERATION.

Fwd: Eco-Petroleum

From: Harry Zhabilov (zhabilov@att.net)

To: dimitar.savov@ymail.com

Date: Monday, March 19, 2018, 06:22 PM GMT+2

Begin forwarded message:

From: "Tiffany Baxter" < tiffany@natco.com>

Subject: RE: Eco-Petroleum

Date: March 19, 2018 at 9:13:01 AM PDT To: "Harry Zhabilov" <<u>zhabilov@att.net</u>>

Reply-To: < tiffany@natco.com>

Harry:

I sincerely apologize; however, it appears we did leave a "V" out of his Slavchev. If he will return the certificates, we will correct them immediately and return.

Shares are restricted for a minimum of one year for non SEC reporting companies. Once the year has lapsed, the shares are eligible for legend removal pursuant to Rule 144 assuming the shareholder is not an affiliate of the issuer and the issuer is not a shell company.

Best regards, Tiffany Baxter Transfer Agent Manager

Nevada Agency and Transfer Company 50 West Liberty Street, Suite 880 Reno NV 89501

Tel: 775-322-0626 Fax: 775-322-5623

PLEASE MAKE NOTE OF OUR NEW EMAIL AND WEBSITE:

Email: tiffany@natco.com Website: www.natco.com

THIS EMAIL AND ANY FILES TRANSMITTED WITH IT ARE PRIVILEGED, CONFIDENTIAL, SUBJECT TO COPYRIGHT AND INTENDED SOLELY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHOM THEY ARE ADDRESSED. ANY UNAUTHORIZED USE, COPYING, REVIEW OR DISCLOSURE IS PROHIBITED. PLEASE NOTIFY THE SENDER IMMEDIATELY IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR. THANK YOU FOR YOUR ASSISTANCE AND CO-OPERATION.

----Original Message---From: Harry Zhabilov <<u>zhabilov@att.net</u>>
Sent: Sunday, March 18, 2018 9:43 AM
To: <u>tiffany@natco.com</u>
Subject:

Hi Tiffany I hope you are doing well. I have a complain from one shareholder Dimitar Slavchev Savov. I is complaining regarding misspell of his middle name. How could be fixed. The correct spelling is SLAVCHEV.Also the shareholders from Bulgaria ask why the share are restricted. Could you please explain in details how the law works in the US for free trading shares. Thanks Appreciate it.

EXHIBIT 3

"NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/7/13"

"NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 27/13"

FNAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 272/13"

WAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 27/13*

"NAME CHANGE TO ECO.PETROLEUM SOLUTIONS, INC. ON 2/7/13"

NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/7/13"

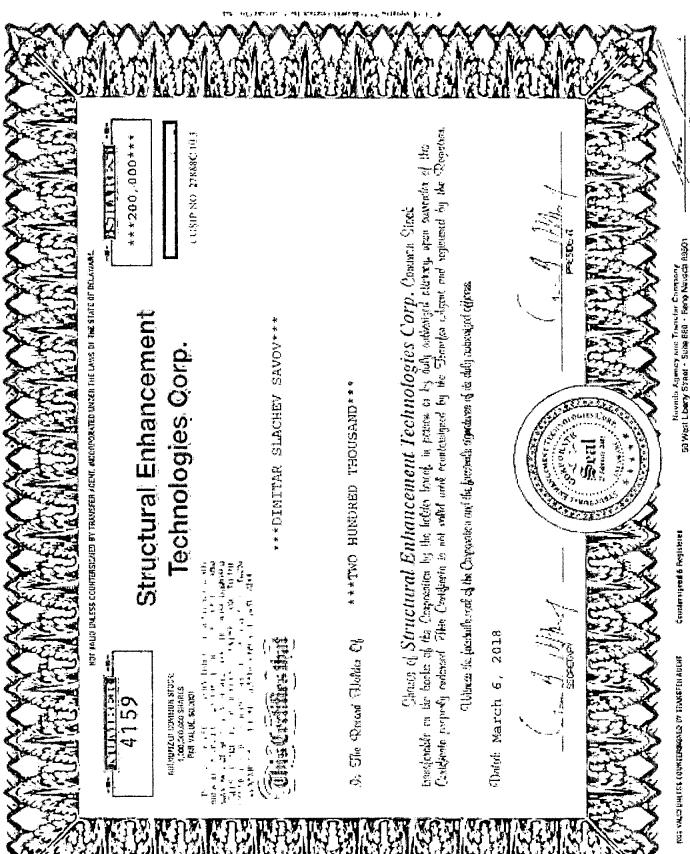
WAME CHANGE TO ECO-PETROLLEUM SOLUTIONS, INC. ON 27/13"

"NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 27/13"

"SAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/7/13"

NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/7/13"

Annual algorithm



"NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 27/13"



TRANSPORTER OF THE PROPERTY SOLUTIONS, INC. ON 2/7/15"



NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 277137

NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 27/13"

-NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/7/13"

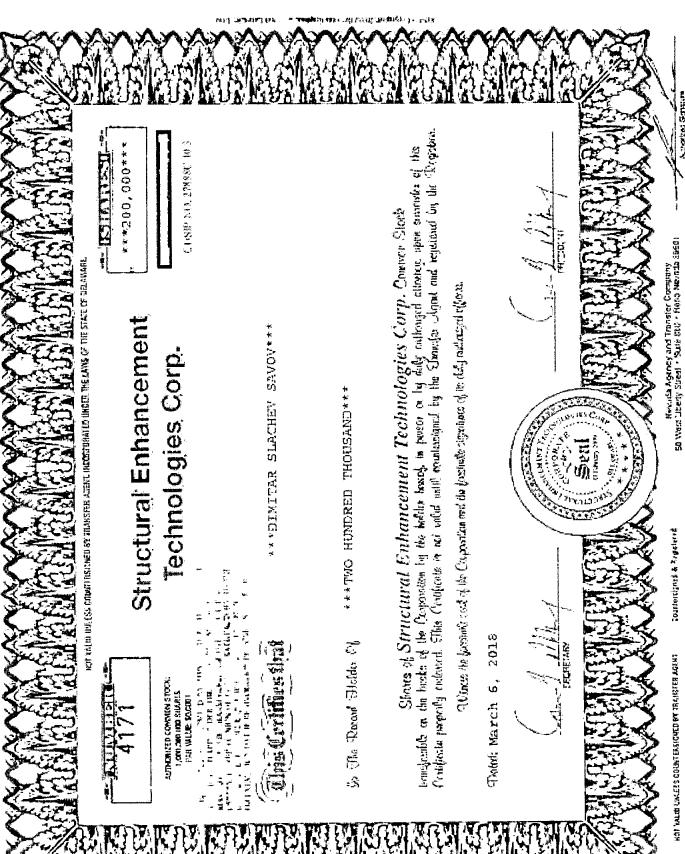
"NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/7/13"

"NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/7/13"



PACESTON SEPTIMENT

"NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/7/13"



NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/7/13"

"NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/1/13"

ALTERED SUPPLIES

"NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/7/13"

Caustingrei & Argideral

kob valið dheest tounsenetteð by transfen agent

NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/7/13"

'NAME CHANGE TO ECO-PETROLEUM SOLUTIONS, INC. ON 2/7/13"

EXHIBIT 2

SWIFT/SEPA нотификации по изходящи валутни преводи

IBAN: 70001520786869, branch: 220, период: 11.07.2017

При задаване на Branch code се зареждат преводи само от последния ден на избрания период.

ነጉ ፑ	SWIFT Single Customer Credit Transfer
Basic Header	F 01 UNCREGSFAXXX 0009 074420
Application Header	I 103 CHASUS33XXXX N
Jser Header	Service Code 103: Bank. Priority 113: Msg User Ref. 108: 17711103753E0500
	Validation 119:
-) !- p.f	*20 : 7192100858
Sender's Ref. Bank Operation Code	*23B : CRED
Settlement Amount	-32A : 170711USD190000,00
Instructed Amount	33B : USD190000,00
Ordering Customer	+50 : /BG57UNCR7000152U/86869
Ordering Cuscomer	IMMINOTECH LABORATORIES BG
	SOFIYA UL. NISHAVA 61 VH. A ET. 3 A
	P. 6, BULGARIA
Ordering Institution	52 : UNCRBGSFXXX
Account with Inst.	57 :
	BOFAUS3N
Beneficiary Customer	-59 : /325016667934
	IMMUNOTECH LABORATORIES INC. 120 W.POMONA AVE MONROVIA CA 91016
Remittance Info.	70 : BUSINESS
Details of Charges .	*71A : OUR
Trailer	MAC:
4	CHK:
	PDE:
	PDM:
1	DLM:
	or and + 1

```
7072101106
MT F
                        SWIFT Fingle Customer Credit Transfer
                      F 61 UNCHBGSFAXXX 4765 631761
Basic Header
Application Header
                      I 103 CHASUSABXXXX N
                       Service Code
                                       103:
_se: Hesdet
                       Dank, Privriny 113:
Mig User Ref. 108: 17313115902E0601
                       Mag Oser Ref. 105:
                       *20 : 7072101106
Sender's Ref.
Bank Operation Code '2'B : CRED
                      +32A : 170313USD15C0,00
Settlement Amount
                        33B ;
Instructed Amount
                                    USD1500,00
                       -50 : /BG$7UNCR7C001520786869
Ordering Customer
                                IMMUNOTECH LABORATORIES BG LTD
                                GR. JOFIYA UL. NISHAVA 61 VH. A ET.
                                3 AF. 6, BULGARIA
Ordering Institution
                        : څذ
                                UNCERGSENAX
                        4, 7
Account with Inst.
                                TOFAUS3N
                        ·59 : /C997404058
Beneficiary Sustomer
                                HARRY HARRIEV ZHADILOV
                                9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                775 USA
                        70
                             . BUSINESS
Remittance Info.
                       *71A : OUR
Details of Charges
Trailer
                               MAC:
                               CHK: N/A
                               PDE:
                                POM:
                                DLM:
```

MT F	SWIFT Single Customer Credit Transfer
Basic Heade: Application Header	F 01 NUCREGOTAXXXX 0004 001401 I 103 CHASUSFIXXXX N
User Header	Service Code 103: Bank, Priority 113: Msg User Ref. 108: 17328111003E0400
	Validation 119:
Sender's Ref.	120 : 7087 190861
Bank Operation Code	*23B : CRED
Settlement Amount	132A : 1777;8USD1500,00
Instructed Amount	33B : USD1500,00 -50 : /BU57UNCR79UD1520786869
Ordering Customer	-50 : /BJ57UNCR70U01520786869 IMMUNOTEH LABORATORIES BG OOD GR. DOFIYA UL. NISHAVA 61 VH. A ET. 3 AP. 6. BULGARIA
Ordering Institution	• •
Abcount with Inst.	57 : //FWO26069533 BANK OF AMERICA BE CENTER N 0626 35 SI E FOOTHILL BLVD PASADENA CA 9110 7 UJA
Beneficiary Customer	*59 : /C597434658 HARRY HARRIEV ZHABILOV 9192 FAIRVIEW AVE SAN GAERIEL CA 91 775
Remittance Info.	70 : BUSINESS
Details of Charges Trailer	*71A : OUF
	MAC:
	CHR:
	1 DE:
	# DM : PLM:

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7100101197
MT F
                       SWIFT Single Customer Credit Transfer
                     F 01 UNCFEGSFAXXX 0005 010940
Basic Header
Application Header I 103 CHASUS33XXXX N
User Header
                                     103:
                       Service Code
                       Bank, Priority 113;
                       Msg User Ref. 108: .7410122007E9700 Validation 119:
                      -20 : 7113131197
Sender's Ref.
Bank Operation Code
                     *23E : "PED
Settlement Amount
                     -32A : 17:410JS01600,JQ
Instructed Amrunt
                       138 : UFD1600,00
                     '50 : /BC$7';NCR7C301520786969
Ordering Customer
                               IMMUNOTECH LABORATORIES EG
                               SOFIYA UL. NISHAVA 61 VH. A ET. 3 A
                               P. 6, BULGARIA
                      52 ;
Ordering Institution
                               UNCRBGSFXXX
                       • 7 :
Account with Inst.
                               BJFAUS3N
Beneficiary Cuscomer -59 : '0997404058
                               HARRY HARRIEV ZHABILOV
                               9192 FAIRVIEW AVE SAN GABRIEL CA 31
                               775
                       70 : BUSINESS
Remittance Info.
                     771A : OUF
Details of Charges
Prailer
                              MAC:
                              CHK:
                              FDE:
                              Flus:
                              CLM:
```

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7117101578
                         CWIFT Single Customer Credit Transfer
MT F
                        F 01 UNGREGSFAXXX 0007 622802
Basic Reader
Application Header
                       I 103 CHAL ISTIXXXX N
                        Service Code 103:
Bank: Priority 113:
User Header
                        Mag User Pef. 108:
                                         108: 17427124003E0400
                        -20 : 7117101578
Sender's Ref.
                        *238 : CRED
Hank Operation Code
                        -32A : 170427USD16J0,00
Fattlement Amount
                                    USD1600,00
Instructed Amount
                         33B :
                        -50 : /BG57UNCRT0001520786869
Ordering Customer
                                 IMMUNOTECH LABORATORIES BG OOD
                                 CR. SOFIYA UL. HISHAVA 61 VH. A ET.
                                  3 AP. 6, BULGARIA
Ordering Institution
                          52 :
                                  CHCEBGSFXXX
                          57 :
Account with Inst.
                                  BOFAUS3N
Beneficialy Customer
                         + 5,9
                             : /0997404058
                                  HAPTY HAPPIEN ZHABILOV
                                  1192 FAMILEN AVE SAN GABRIEL CA 917
                          70 · CUSINESS
Remittance Info.
Details of Charges
                         * 11A
                                 אייכ
Trailer
                                 MAG:
                                 CHK:
                                 PDE:
                                 PDM:
                                 PLM:
```

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7131100923
                         SWIFT Single Customer Credit Transfer
MT F
                       F 01 UNCRBGSFAXXX 0007 032239
Basic Header
Application Header
                       I 103 CHASUS33XXXX N
                        Service Code

Bank. Priority 113:
108: 17511105505E0300
User Header
                        Msg Jser Ref. 108:
                        +26 : 7131180923
Sender's Ref.
Bank Operation Code +23B : CRED
Settlement Amount
                       +32A : 170511USD1600.00
Instructed Amount 33E USF1600,00
Urdering Customer :50 : /BG57UNCR70001520786869
                        33E
                                     USP1600,00
                                 IMMUNOTECH LABORATORIES BS
                                 GP. SOFIYA UL. NISHAVA 61 VH. A ET.
                                 3 AF. 6, BULGARIA
Ordering Institution
                        £2 :
                                  UBCREGGEMAN
                        57 ;
Account with Isst.
                                  BOFAUSIN
                         *59 : #U997404053
Beneficiary Custome:
                                 HARRY HARRIEV ZHABILOV
                                  3192 FAIRVIEW AVE SAN GAERIEL CA 91
                                  775
                          70 : BUTINESS
Remittance Info.
Details of Charges
                         *71A : DUR
Trailer
                                 MAC.
                                 CRE:
                                 FDE:
                                 PDM:
                                 DLM:
```

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7137100781
MT F
                        SWIFT Single Customer Credit Transfer
Basic Header
                       F C1 UNICPESFFARXX 0007 036419
Application Macder
                       F ANGER SUPPLIES TO COLUMN
User Header
                        Service Code
                                       103:
                        Bank, Pricrity 113:
                        Mag User Ref. 108:
                                        108: 1751711200380101
Sender's Ref.
                       *20 : 7137100781
Eank Operation Code
                       1238 : CRED
Settlement Amount
                       *32A : 179517US91500,00
                        33B
Instructed Amount
                                   US01500,00
Ordering Customer
                       *50 : /BG57UNCR70001520786969
                                IMMUNOTECH LABORATORIES BG OOD
                                GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                3 AP. 6, BULGARIA
Ordering Institution
                       52
                                UNCRESSIXXX
Account with Inst.
                        57
                            :
                                HERLARDS
Beneficiary Customer
                       •59 : 0997404.58
                                HABRY HAPPIEV 2HABILOV
                                9192 PATRVIEW AVE SAN GABRIEL CA 91
                                775
Remittance Info.
                        73
                            . BUSINESS
Details of Charges
                      *71A : OUR
Trailer
                               MAC:
                               CHK;
                               FDE:
                               FOM.
                               DLM:
```

```
7139100898
                                                        1
MT F
                         SWIFT Single Customer Credit Transfer
                        F OI UNCREGSFAXXX 0007 038487
Basic Header
                       I 103 CHAS JS33XXXX N
Application Header
                        Service Code
Wser Header
                                        103:
                        Bank, Priority 113:
                        Msg User Ref.
                                        108: 17519115504E0790
                        Validation
                                        119:
Sender's Ref.
                        ·20 : 7139100898
                      *238 : CRED
Bank Operation Code
Settlement Amount
                       -32A : 170519USD10000.00
Instructed Amount
                        338 :
                                     USD10000,00
                        *10 : /BGSTUNCR70001520786869
Ordering Customer
                                IMMUNOTECH LABORATORIES EG
                                GR. SOFIYA UL. MISHAVA 61 VH. A ET.
                                  A'. 6. EULGARIA
Program institution
                         52 :
                                UNCEBĞGEXEX
                         57
Account with Inst.
                                BOFAUS IN
Beneficiary Customer
                        *59 : /0997404058
                                HARRY HARRIEV ZHABILOV
                                 9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                 775
Remittance Info.
                         TO : BUSINESS
Details of Charges
                        *71A : OUR
Trailer
                                MAC:
                                CHK:
                                PUE:
                                PCM:
                                DIM:
```

```
7146100386
MT F
                        SWIF" Single "ustomer Credit Transfer
                       F 01 UNCHBGSFAXXX 0008 042440
Basic Header
Application Header
                       T 103 CHASUJ33XXXX N
                        Service Code
                                        103:
User Header
                        Bank. Priority 113:
                                      108: 17526092502E0500
119:
                        Msg User Ref.
                        Validation
Sender's Bef.
                       -20 - 7 46100380
Bank Operation Coos
                      *238 : C380
                      -31A 17052F15010000, 10
Settlement Arount
                        338
                                    05010000,00
Instructed Amount
Ordering Customer
                       +50 : /BG57UNCR70001530786839
                                HIMPHOTECH LABORATORIES BG OOD
                                GF. SOFIYA UL. NISHAVA 61 VH. A ET.
                                3 AP. 6, BULGARIA
Ordering Institution
                         52 :
                                UNCREGSFXXX
                         57 :
Acquent with Inst.
                                BOFAUS3N
                        -59 : /0997404058
Beneficiary Customer
                                HARRY HARRIEV CHABILOV
                                 3192 FAIRVIEW AVE SAN GABPIEL CA 91
                                 775
                        70 : BUSINEUS
Remittance Info.
Details of Charges
                      *71A : OUR
Trailer
                               HAC:
                               CHK:
                                FUE:
                                F 11 '
                                DLM.
```

```
7159100920
                              SWIFT Single Customer Credit Transfer
MT E
                             F 01 UNCREGSFAXXX 0008 051622
Basic Header
Application Header
                             I 103 CHASUJ33XXXX N
                              Service Code 103:
User Header
                              Dank, Prioricy 113:
                              Msg User Ref. 108-17609120001E0100
Validation 119:
| Sender's Ref. | -20 : 7159100923 |
| Bank Operation Code | +23B : CREP |
| Settlement Amount | +32A : 176398USD10000,00 |
| Instructed Amount | 33B : USD10000,00 |
| Ordering Customer | +50 : /BG570NCR70001520786869 |
                                        IMMUNOTECH LABORATORIES BG
                                         GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                         3 AP. 6. BULGARIA
Ordering Institution
                               52 :
                                         THURBGSENNY
                               F7 :
Account with Inst.
                                         BOFAUE314
                               *59 . / )997404038
Beneficiary Customer
                                        VOLTERNA VERRAL VERAL
                                         3102 FAIRVIEW AVE SAN GABFIEL CA 91
                                         7-5
                               70 : BUSINESS
Pemittance Infi.
                           *71A * CUR
Details of Charges
 Trailer
                                        MAC.
                                        ChS
                                        PDE.
                                         PDM:
                                         DLM:
```

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7163100410
                           SWIFT Single Customer Credit Transfer
MT F
                         DESERGE BEDD MYXXATTORADM, LO 19
Basic Header
Application Header
                         S KXXXELLISKHT LOT :
                          Service Code 100
Bank, Priority 113:
Msg User Ref. 106: 17612065508E0300
User Header
Sender's Ref.
Bank Operation Code +23B : CPED
Settlement Amount +32A : 170612USD1500,00
                         338 : USD1500,00
-50 : EG57UNCR70001520786869
Instructed Amount
Ordering Customer
                                   IMMUNOTECH LABORATORIES BG
                                    GP, SCRIYA UL. NISHAVA 61 VH. A ET.
                                    3 AF. 6. BULGAFIA
Ordering Institution
                                    UNCRBGSFXXX
Account with Inst.
                           57 :
                                    EDFAUC3N
                           ·59 : /0997404056
Reneficiary Customer
                                    HAFRY HAPRIEY SHAETLOV
                                    91-1 FAIR"IEW AVE SAN GABRIEL CA
                                    91775
                           70 : BUSCINES
Remittance Info.
                         *71A : OLR
Details of Charges
Trailer
                                   MAC:
                                   CHK
                                   FCE:
                                   FDM
                                   DIM
```

```
7163101182
                        SWIFT Single Customer Credit Transfer
MT F
                        F 01 UNCRECSFAXXX 0008 053704
Basic Header
Application Header 1 103 CHASUS33XXXX N
                        Service Code 103:
User Header
                        Bank. Priority 1.3:
                        Msg User Ref. 108: 17512123501E0400
Validation 119:
                        *20 7163101182
Sender's Ref.
Bank Operation Code *23B : TEC
Settlement Amount *32A : 173512U3D1100.CC
                        33B : 3861,00,00
Instructed Amount
Ordering Customer
                        +50 : /5G5/UNCR70001320786869
                                 IMMUNOTECH LABORATORIES BG
                                 GR. SOFIYA UL. NISHAYA 61 VH. A ET.
                                  R AP. F. BULGARIA
Ordering Institution
                        5.2
                                 JUCKBOSFILLX
                         57
Account with Inst.
                                 ECFAUSSIN
                         *59 : /0997404058
Beneficiary Customer
                                 HARRY HARRIEV ZHABILOV
                                 9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                 ~35
                         TO : BUSINESS
Pemittance Info.
                       *71A : OUR
Duralls of Tharges
Trailer
                                 MAC:
                                 CHK
                                 PIE
                                 F. 4
                                 DLM:
```

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7191100700
MT F
                        SWIFT Single Customer Credit Transfer
                       F 01 UNCEBCLEAXXX 0009 073379
Basic Header
Application Header
                     I 103 CHASUS?3XXXX N
                                        103:
                        Service Code
Use: Header
                        Bank, Priority 113:
                       Msg User Ref. 10E: 17710103502E0600
Validation 1:9:
                       ·20 : 191100700
|Sender's Ref.
                      ·238 : CREC
Bank Operation Code
Settlement Amount
                      -32A : 170710UED3100,00
                                    050310C, C.
Instructed Amount
                        328 :
                       +50 : /BG57UNTR70031510786869
Ordering Customer
                                 IMMULITECH LABORATORIES BG
                                 GP SOFIYA UL. NISHAVA 61 VH A ET.
                                 3 MP. 6, EULGARIA
Ordering Institution
                                 MUNRBUSFA X
                        5.7
Account with Inst.
                                 FOFAUS3N
Beneficiary Customer
                        • 59
                                70997404058
                                HARRY HARRIEV ZHABILOV
                                9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                775
                        70
                                BUSINESS
Remittance Info.
                       TIA : DUR
Details of Charges
Trailer
                                MAC:
                                CHK:
                                POE:
                                PDM:
                                PLM:
```

7207100697				<u> </u>				į	1 1	
MT F	SWIF	r s	ingle C	istomer	Cred:	it Tra	insfer			
Basic Header Application Header	F 91 1 103		icregefai Rasus 33XX		0 095	324				
User Header	Bank. Msg U	Pi sei	Code riority Ref.	113: 198:	17726	11000!	5E01 0 1			
Gender's Ref. Eank Operation Code Settlement Amount Instructed Amount Ordering Customer	•20 •238 •32A 338	: : : :	7201100 CRED 1717DCC U /BG57UN IMMUNO GR. SO	697 SC1500, TD1500,	OU 52078 BORAT J. NIS	ORIES		A ET		
Ordering Institution	52	:			ALL					
Account with inst.	57	•	EDFAUS							
Beneficiary Customer	* \$ 3	٠		4058 Hadrie 'Airvie!			ABRIEI	CA 9	1	
Remittance info. Details of Charges Trailer	70 +71A		BUSINES	ទ						
The community of the control of the			MAC. CHK: PUE: PDM. DLM:							

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7234100525
                        SWIFT Single Customer Credit Transfer
MT F
                       F 01 UNCFBESFAXXX 0011 102806
Basic Header
Application Header
                       T 103 CHAULEBRANK N
                                        103:
                         Service C de
User Header
                        Tank. Pri tity 113:
Mng User Pai. 118: 1782P102503E0701
Validation 119:
                         Validation
                        +2n : 7234100525
Sender's Pef.
                       +23B : CRED
Bank Operation Code
                        *37A : 170322 EU1500,00
 Settlement Amount
                                      JSD1500.00
                         3 40 ;
 Instructed Amount
                        -50 : /BG57UNCRT0001520786369
 Ordering Customer
                                 IMMUNOTECH LABORATORIES BG OOD
                                  SOFIYA UL. NISHAVA 61 VH. A ET. 3 A
                                  P. E. BULGARIA
 Ordering Institution
                          51 .
                                  UNCREGOTXXX
 Account with Inst.
                          57 :
                                  BUFAUG3N
                          ·59 : /2397404058
 Beneficiary Customer
                                 HARRY HARRIEV SMABILOV
                                  9102 FAIRVIEW AVE SAN GABRIEL CA 91
                          TO : BULTNESS
 Remittance Info.
                        -TIA : OJF
 Details of Charges
 Trailer
                                  MAC
                                  CFK:
                                  PDL:
                                  PDM.
                                  DLM:
```

242100859	
tt F	SWIFT Single Costomer Credit Transfer
Basic Header	r on untractraxxx outilitiessy
Application Meader	1 113 CHAGNEG33XXXX N
User Heade:	Sarvice Code 103:
	Bank. Priority 113:
	Msg User Ref. 198: 17830111002E0400
	Validation 119:
Sender's Ref.	+20 : 7242100859
Bank Operation Code	*238 : CPED
Settlement Amount	#32A : 170930USD1500,00
Instructed Amount	33B : @\$D1500.00
Ordering Customer	+50 : /8@57UNCR70001520786869
200000	IMMUNOTECH LABORATORIES BG
	GR. SOFIYA UL. NISHAVA 61 VH. A ET.
	R AP. 6, BULGARIA
Ordering Institution	52
	MENTERS FXXX
Account with Inst.	57 : //FW006009593
Water was a second	BASSE OF AMERICA B CENTER 0626 3955
	E. FOGSHILL BEVE PASAGENA CA 91107
Beneficiary Custome:	-59 : 7999°4.40°8
	'ARRY HARRIEV LHABILOV
	1.92 FAIRVIEW AVE SAN GABRIEL CA 91
	:74
Remittance Info.	70 : BUSINESS
Details of Charges	·71A . OUR
Trailer	
1101211	MAC:
	CHM;
	PLE:
	FERE
	DLM:

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7250101541
                       SWIFT Single Customer Credit Transfer
MT F
                      F 01 UNCPEGSFAXXX 0011 113839
Basic Header
                      I 103 CHASUS33XXXX N
Application Header
                       Service Fode
                                      103:
User Header
                       Bank, Priority 113:
                       Mag Jaer Ref. 108:
                                      108: 17907122502E0400
                       Validation
                       +20 : 7250101541
Sender's Ref.
                      +238 + CR20
Bank Operation Code
                      /32A 1700070553000,00
Settlement Amount
                                    7503000,00
                       33B :
Instructed Amount
                      -50 : /BC57UHCR700C1523786869
Ordering Customer
                                IMMUNATETH LABORATORIES BG
                               OF COFIYA IL. NIBHAVA 61 VH. A ET.
                                3 AP. A, BULGARIA
 Orpering Institution
                                UNICEBUSEXXX
                         51
Account with Inst.
                                BCFAUS3N
                        -54 : /1997404058
 Reneficiary Customer
                               HARRY HARRIEV ZHABILOV
                                9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                775
                        70 : BUSINESS
 Remittance Info.
 Details of Charges '71A : CUP
 Trailer
                                MAC:
                                CHK:
                                FDE:
                                POM:
                                DLH:
```

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7275101327
                        SWIFT Single Costomer Credit Transfer
MT F
                       F PI UNCREGSFAXXX 0013 130714
Basic Header
                       I 103 CHASUSBBXXXX N
Application Header
                        Service Code
                                       103:
User Header
                        Sank. Privrity 113.
                                       108: 17A01122002E0100
                        Mag Caer Pel.
                                       119:
                        Validation
                        +20 : 7275101327
Sender's Ref.
                       •238 : CRED
Bank Operation Code
                        *32A : 171002USD3000,00
Settlement Amount
                                   9863000.00
                        33B :
Instructed Amount
                             : /BG57UNCR70001520786869
                        • 50
Ordering Customer
                                IMMUNOTECH LASCRATORIES BG COD
                                 GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                 3 AP. 6. BULGARIA
 Ordering Institution
                         52
                                 UNCERGIEXXX
                         57
 Account with Inst.
                                 BOTATS3N
                             : /0/97404058
                         + 59
 Beneficiary Customer
                                 HARRY HARRIEV ZHABILOV
                                 9192 PAIRVIEW AVE SAN GABRIEL CA 91
                                  7
                         70 : POSINESS
 Remissance Info.
                                ~::R
 Tetails of Charges
                         +71A
 Trailer
                                 985
                                 HK:
                                 : CE:
                                 POM:
                                 DLM:
```

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7292100770
                         SWIFT Single Customer Credit Transfer
MT F
                        F 01 UNCREGSFAXXX 0014 143997
Basic Header
                        T 103 CHASUS33XXXX N
Application Header
                        Service Code 103:
Bank, Prior.ty 113:
Msg User Fef. 108: 17A13112002E0300
119:
User Header
                        ·20 : 7292100770
Sender's Pef.
                       ·23B · CRED
Bank Operation Code
Settlement Amount
                       +32A 1'1019U5E30U3,0U
                         338 :
                                      P$93 100, 00
Instructed Amount
                        +50 : /BG37090770001500786869
Ordering Custome:
                                 IMMUNITUELH LABORATORIES BG
                                 OR. SOFIYA UL. NISHAVA 61 /H. A ET.
                                  3 AP. 6. BULGARIA
Ordering Institution
                                  UNCRBUSFAKY
Account with Inst.
                          57 :
                                  BCFAUS3N
                         *59 : /r9974 4058
 Beneficiary Customer
                                  HARRY HARRIEV ZHABILOV
                                  9192 FAIRVIEW AVE SAN GABRIEL CA 91
                          70
                              : BUSINESS
 Remittance Info.
                       *71A : CUR
 Denails of Charges
 Trailer
                                 14.40
                                  CLA:
                                  POE:
                                  PDM:
                                  DLM:
```

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7310100612
                         SWIFT Single Customer Credit Transfer
MT F
                        F 01 UNCEBGSFAXXX 0015 155858
Basic Header
                        L 107 CHA. JC33XXXX B
Application Header
                         Service Lide 103;
Bank, Pricrity 113;
Mss User Ref. 108: 17806100008E0700
User Header
                         Msg User Ref. 108:
                         -20 + 7310100612
Sender's Ref.
                        *238 : CRED
Bank Operation Code
                        -32A : 171106USD3000,00
Settlement Amount
Instructed Amount
                         338 : USB3000,00
                        -50 : /BG57UNCR70001520786869
Ordering Customer
                                  IMMUNOTECH LABORATORIES BG
                                   GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                   3 AP. 6. BULGARIA
Ordering Institution
                                   UNCREGSEXXX
                          57 :
Account with Inst.
                                  POFAUCIN
                               77947404058
                          .50
Beneficiary Customer
                                  HARNY HAFRIEV SHABILOV
                                   HIVE FAIFVIEW AVE SAU GABRIEL CA 91
                                   ? ": s.
                          70 : L'ISTRESS
Remittance Info.
                        *71A * 797
 Details of Charges
 Trailer
                                  MAC:
                                  CHK:
                                  PDE:
                                  PDM:
                                   DIM:
```

```
7326100716
                        SWIFT Single Customer Credit Transfer
MT F
                       F 01 UNCREGOFAXXX 0017 163206
Basic Header
                       T 103 CHASUSBERXXX N
Application Header
                                       :03
                        Service Code
User Header
                        Sank. Priority 113:
                        Msg User Pef. 10s:
                                       108: 17822110501E0500
                        Validation
                       +29 : 7326109716
Sender's Ref.
Bank Operation Code +23B : CRED
Settlement Amount +32A : 1711227sb3000,00
Settlement Amount
                        33B :
                                     JEL 1000,00
Instructed Amount
                      .5C . 1E557UNCP70001520786869
Ordering Customer
                                 IMMUNOTECH LABORATORIES EG
                                GP. SOFINA LL NIGHAVA 61 VH. A ET.
                                 3 AP 6. BULGARIA
Ordering Institution
                         5.. :
                                  CHE JETXXX
                         5.7
 Ac runa with Incr.
                                 BOFAUS 3N
                         -59 : 70997404058
 Beneficiary Customer
                                 HARRY HARRIEV ZHABILOV
                                 3192 PAIRVIEW AVE SAN GABRIEL CA 91
                                  15
                         70 : BUSINESS
 Remittance Info.
 Details of Charges •71A : OUR
 Trailer
                                 MAC:
                                 CHF:
                                 POE .
                                 FDM:
                                 DLM:
```

```
7339101824
                         SWIFT Single Customer Credit Transfer
MT F
                        F 01 UNCPBGSFAXXX 0017 178060
Basic Header
Application Header
                        T 103 CHASUG33XXXX N
                        Service Code 102:
Bank, Priority 113:
108: 13005143504E0402
User Header
                        -20 : 7339101824
Sender's Ref.
Bank Operation Code
                       *238 : CRED
                       +32A : 17120505D3000,00
Settlement Amount
                       33B USD3007, DU
•50 / /phr/UNCR70001520786369
Instructed Amount
Ordering Castomer
                                 IMMUNOTECH LABORATORIES BG
                                  EJETYA H. MISHANA 61 VH. A ET. 3 A
                                  P. 6. BULGARIA
Ordering Institut...:
                        52 :
                                  UNCREGIEXXX
                        57 :
Account with Inst.
                                  BOFAUGBN
Beneficiary Customer
                         +59 : /0997404058
                                 HADRY HARRIEV ZHABILOV
                                  3192 FAIFVIEW AVE SAN GABRIEL CA 91
                                  175
                         70 : PUSINESS
Pemittance Info.
Details of Chaiges
                        *71A : OUF
Trai.er
                                 MAC
                                 JHK:
                                 FUE:
                                 r- red
                                 Luly.
```

```
7356100837
                        SWIFT Single Customer Credit Transfer
MT F
                      F 01 UNCRBGSFAXXX 0018 192857
Basic Header
                      I 103 CHASUG33XXXX N
Application Header
                       Service Code
                                       103:
User Header
                       Bank. Priority 113:
                                     108: 17022104004E0600
119:
                       Mag User Ref.
                       Validation
                      ·20 : 73561C0837
Sender's Ref.
                      *23B : CRED
Bank Operation Code
                       *32A : 171222***DD: 00, 0
Sattlement Amount
                       +5r 2057t NCR (1001520786869
Instructed Amount
Ordering Distomet
                                IMMUNOTETH LABORATORIES BG
                                GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                3 AP. 6, BULGARIA
                         52
Ordering Institution
                                UNCREGSEMAN
Account with Inst.
                         57
                                BOFAUSSN
                        *59
                            : /0097404058
Beneficiary Customer
                                HARRY HARRIEV ZHABILOV
                                9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                 775
                         70 : BUSINESS
Remissance Info.
                      *71A : 100A
 Details of Charges
 Trailer
                                MACI
                                185
                                POE:
                                FOM:
                                OLM:
```

8010101329 SWIFT Single Customer Credit Transfer MT F F DI CNCRECJELXXX 0018 202636 Basic Header I 103 CHACES33XXXX N Application Header 103: Service Code User Header Bank. Priority 113: Msg Uzer Raf. 108: 1811/130001E0400 Varidation 119: ·20 : 8010101323 Sender's Ref. *238 : CHED Bank Operation Code *32A : 1801107901500,00 33B : USD1500,00 Settlement Amount Instructed Amount *50 : /BG57UNCR70001520786869 Ordering Customer IMMUNDTECH LABORATORIES BG GR. SOFIYA UL. NISHAVA 61 VH. A ET. 3 AP. 6, BULGARIA 52 Ordering Institution UNCREGSFXXX 57 Account with Inst. BOFAUSBN : /0997404058 Beneficiary Customer ~ 5 S HARRY HARRIEV ZEASILOV 9192 FAIRVIEW AVE SAN GABRIEL CA 91 775 70 : BUSINESS FOR YF. 3555 E. FOOTHILL BLVD Remircance Info PASACENA CA 91 17 Details of Charges * 1A : CUR Trailer 4 1C: CaKi PDS: PEM: L'LM:

AT F	SWIFT Single Customer Credit Transfer F 01 UNCRBGGFAXXX 0018 210649 I 103 CHASUS33XXXX N						
Rasic Header							
Application Reader	I 103	CHASUS33XX	KXX N				
User Header	Servic	e Jode	103:				
	Bank.	Priority	113:				
	Mag Us	er Pef.	108: 18122102504E0700				
	Valida	ticn	119:				
Serder's Ref.	-20	: 8522100	717				
Sank Operation Code	·23B	: CRED					
Settlement Amount	-32A	· 180122U	SD1500, 07				
Instructed Amount	338	: 0:	501500,00				
Ordering Customer	•50	: /860/000	CR70001520786869				
	IMMUNOTECH LABORATORIES BG						
		GR. 9 0	Fila UL. NISHAVA 61 VII. A ET.				
		3 AP.	e, eulgaria				
Ordering Practication	52	:					
		LNLABG	SFXXX				
Account with Inst.	57	:					
		JOFAUS					
Beneficiary Customer	- 59	: 399740	4058				
,		HAPRY	HAPPIEY ALABILOV				
		9192 F	AIRVIEW A.E SAN GABRIEL CA 91				
		5					
Remittance Info	73	: BUSINES	S FOR YR. 3555 E.FOOTHILL BLVD				
PASADENA CA 21107							
Details of Charges	*71A	: DUR					
Trailer							
		MAC:					
		CHF:					
		POE:					
		PCH:					
		DLM:					

```
8024100677
                         SWIFT Single Customer Credit Transfer
MT F
                       F C1 UNIRBOSFAMMM 0018 212747
Basic Header
Application Header
                        I 103 CHASUS33KXXX M
                        Service Code 103:
Bank, Priority 113:
Msg User Ref. 108: 18124114003E0200
Validation 19
User Header
                        -20 : BC24109677
Sender's Ref.
Bank Operation Code
                        *23B : CRED
                        *32A : 130124US01500,00
Settlement Amount
                                      USD1500.09
                         338 :
Instructed Amount
                        -50 : /83570HCR7000152J786869
Ordering Customer
                                  IMMUNOTECH LABORATORIES BG
                                  GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                  3 AP. 6, BULGARIA
                          52 :
Ordering Institution
                                  UNCREGSTXXX
                          57 :
Account with Inst.
                                  COFAUSSN
                         +59 : /1997404058
Benaficiary Customer
                                  VOJIEAHS VSISSAH YSAAH
                                  9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                  775
                          70 : BUSINESS
Remissance Info.
Details of Charges
                         *71A : OUR
Trai er
                                 MAC
                                  CLK:
                                  PDE
                                  FOM:
                                  DIM:
```

```
8051101386
                        SWIFT Single Customer Credit Transfer
MT F
                       F C1 UNCREGSFAXXX 0026 232060
Basic Header
Application Header
                       I 103 CHAJUSJIXXXX N
                        Service Code
                                        103:
                        Service Code
Bank. Priority 113:
113:
114: 1822013350420102
Uses Header
                                      119:
                        Validation
                       -20 : 8051101386
Sender's Rei.
Bank Operation Code 238 : TREC
                      →32A : 1500200203000,C0
Settlement Amount
                        338 : + np3000,00
Instructed Amount
                       +50 : /EG57CNCR70001520786869
Ordering Customer
                                 IMMUNOTECH LABORATORIES BG
                                 CR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                 3 AP. 6, BULGARIA
Ordering Institution
                        52 :
                                 UNCRBGSFXXX
                        57 :
Account with Inst.
                                 BCFAUSEN
                         -59 : /0997404058
 Beneficiary Customer
                                 HARRY HARRIEV ZHABILOV
                                 3192 FAIRVIEW AVE SAN GABRIEL CA 91
                                 775
                         70 : BUSINESS
Remirtance Info.
                        *71A : 0UR
 Details of Charges
 Trailer
                                MAC:
                                CLK:
                                PJE:
                                2.34
                                DIM.
```

```
8065101535
                         SWIFT Single Customer Credit Transfer
MT F
                        F OI MICREGEFAXXX 3021 241627
Basic Header
                        T 103 CHASUSSBEEKN N
Application Header
                        Service Code ....
Bank, Priority 113: 18306111502E0100
User Header
                                       :19:
                        -20 : 8065101535
Fender's Pef.
                        -238 : CPED
Bank Operation Code
                        +32A : 180336USD1000.00
Settlement Amount
                        336 :
                                     JSD2000,00
Instructed Amount
                        *50 : /BG57UNCR70001520786869
Ordering Customer
                                 IMMUNOTECH LABORATORIES BG COD
                                 GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                  3 AP. 6, BULGARIA
                          52
Grdering Institution
                                  UNCREGORXXX
                          57
Account with Inst.
                                 BOFAUS3N
                         ·59 : /L997404058
Beneficiary Customer
                                  HARRIEV CHABILOV
                                  9190 PATRVIEW AVE SAN GABRIEL CA 91
                                  775
                          70
                              ; BUSINESS
kemittante Info.
Details of Charges
                         *71A : OUR
Trailer
                                 MAC:
                                 CHK:
                                 P.L
                                 MOS
                                 DLM:
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068101441	
er e	SWIFT Single Customer Credit Transfer
Basic Header Application Header	F 01 UNCREGSFAXXX 0021 245278 I 103 CHASUS33XXXX N
Jaer Headar	Service Code 103: Bank, Priority 113: Mag User Ref. 108: 18309133503E0102 Validation 119:
Sendar's Ref. Bank Operation Code Settlement Amount Instructed Amount Ordering Customer	*20 : 8068101441 *23E : CRED *32A : 180309USD1503.00 33B : USD1500.00 *50 : /8G57UNCR7000152C786869 IMMUNOTECH LABORATORIES BG GR. SOFIYA UL. NISHAVA 61 VH. A ET. 3 AP. 6, BULGARIA
Ordering Institution	52 : Uncregsfxxx
Account with Inst.	57 : BOFAUS3N
Beneficiary Customer	<pre>*59 : /C99T404058</pre>
Penittance Info	70 : BUSINESS
Details of Charges	-71A : OUR
irarier.	MAC:
1	CHK:
	PDE:
	PDM:
1	DITW:

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8170100756
                         SWIFT Single Customer Credit Transfer
MI F
                       F 01 UNCREGSFAMMX 0024 321568
Basic Header
                        I 103 CHASUS33XXXX N
Application Header
                                         193:
                         Service Code
User Header
                         Bank, Priority 113:
                         Mag User Raf. 108: 18619111001E0100 Validation 119:
                         ·20 : 8170100755
Sender's Ref.
                        *238 : CRED
Bank Operation Code
                        -32A : 180619U3D2200,00
33B : USD2200,00
-50 : /8G57UNCR70001520786869
Settlement Amount
Instructed Amount
Ordering Customer
                                  IMMUNOTECH LABORATORIES BG
                                  GR. SOFIYA OL. NISHAVA 61 VH. A ET.
                                   3 AP. 6, BULGARIA
                           52
Ordering Institution
                                   UNCRBGSEXXX
Account with Inst.
                           57
                                   BOFAUS3N
                          *59 : /0997404058
Beneficiary Customer
                                  HARRY HARRIEV ZHABILOV
                                   9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                   775
                          70 : BUSINESS
Remittance Info.
                        *71A : OUR
 Cetails of Charges
Trailer
                                  MAC.
                                  CHE:
                                  PUS:
                                  PDM.
                                  DLM:
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3193100905	1
MT F	SWIFT Single Customer Credit Transfer
Basic Header	F 01 UNCREG3FAXXX 0024 340558
Application Header	I 103 CHASUS33XXXX N
User Header	Service Code 103:
	Bank, Priority 113:
	Msg User Ref. 108: 18712111001E0300
	Validation 119:
Sender's Ref.	+20 : 819310D905
Bank Operation Code	*23B : CRED
Settlement Amount	+32A : 190712US012V0.00
Instructed Amount	33B : USD1200,00
Ordering Customer	-50 : /BG57UNCR70001520786869
•	IMMUNOTECH LABORATORIES BG
	GR. SOFTYA UL. NISHAVA 61 VH. A ET.
	3 AP. 6, BULGABIA
Ordering institution	52 : UNCRBGSFXXX
Account with Inst.	57 :
Account with inst.	BOFAUS3N
The State of Contamer	0.00 to the control of the control o
Beneficiary Customer	HARRY HARRIEV ZHABILOV
	9192 FAIRVIEW AVE SAN GABRIEL CA 91
	775
Remittanco Info.	70 : BUSINESS
Details of Charges	*71A : OUP
Trailer	·
A SECULATION OF SECURATION OF SECULATION OF SECURATION OF SECULATION OF SECURATION OF SECULATION OF SECURATION OF	MAC:
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3200100952 * * * *		_		
1T F	SWIFT	: \$	Single Customer Credit Transfer	
Basic Header	F 01	Uì	NCREGSFAXXX 0025 345997	
Application Header	I 103	CI	M XXXXEELEAN	
User Header			Code 193:	
	Bank	Pı	rioraty 113:	
	Mag U	961	r Ref. 108: 18719115502E0401	
	Valida	at:	ion 119:	
Sender's Ref.	*20	:	8200100952	
Bank Operation Code	*238	:	CRED	
Settlement Amount			1307190501200,00	
Instructed Amount			USD120J, 00	
Ordering Custome:	+50	:	/BG57UNCR70601520786869	
			IMMUNOTECH LABORATORIES BG	
			GR. SOFIYA UL. NISHAVA 61 VH. A ET.	
			3 AF. 6, BULGARIA	
Ordering Institution	52	:	,	
			UNCREGSFXXX	
Account with Inst.	57	:		
	-		BOFAUS3N	
Beneficiary Customer	-59	:	70997404058	
			HARRY HARRIEV ZHABILOV	
			9192 PAIRVIEW AVE SAN GABRIEL CA 91	
			175	
Pemittance Info.	70	1	BUSINESS	
Details of Charges	+71A	:	CUR	
Trailer				
			MAC:	
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			PDM:	
			DIM:	

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8201100555
                        SWIFT Single Customer Credit Transfer
KT F
                      F 01 UNCREGSFAXXX 0025 346907
Basic Header
Application Header
                      I 103 CHASUS33XXXX N
                        Service Code 103:
User Header
                        Bank. Priority 113:
                       Msg User Ref. 108:
                                        108: 18720100502E0101
                       *70 : 82C1100555
Gender's Ref
Bank Operation Code
                      *23B : CRED
                      +32A : 180720USD1200,00
Settlement Amount
                       33B : 0SD1200, UU
+50 : /BG57UNCR70001520786869
Instructed Amount
Ordering Customer
                                IMMUNOTECH LABORATORIES BG
                                GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                3 AP. 6, BULGARIA
lordering Institution
                       52 :
                                UNCRBGSFXXX
                         e, ---
Account with Inst.
                                BOFAUSIN
                        +59 : /0997404058
Beneficiary Customer
                                HARRY HARRIEV ZHABILOV
                                9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                775
                        70 : BUSINESS
Remittance Info.
Details of Charges
                        *71A : OUR
Trailer
                                MAC:
                                CHK:
                                PDE:
                                PIM:
                                DLM:
```

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8221100351
                       SWIFT Single Customer Credit Transfer
MT F
                      F 01 UNCRBGSFAXXX 0026 362354
Basic header
Application Header I 103 CHASUS33XXXX N
                                      103:
                       Service Code
User Header
                       Bank, Priority 113:
                       Msg User Ref. 108: 18809085001E0600
Validation 119:
                       *20 3271100351
Serder's Ref.
                      -238 : JRED
Bank Operation Code
Settlement Amount
                      *32A : 1808090302200,00
                       33B : USD2200,C0
Instructed Amount
                      *50 : /BG57UNCR7C001520786869
Craesing Customer
                                IMMUNOTEH LABORATORIES BG
                                GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                3 AP. 6, BULGARIA
Ordering Enstitution
                       52 :
                                UNCRBGSFXXX
                       57 :
Account with Inst.
                                BOFAUS3N
Beneficiary Customer +59 : /C997404058
                                HARRY HARRIEV ZEABILOV
                                9192 FAIRVIEW AVE SAN GABNEL CA 917
                                75
                       70 : BUSINESS
Remittance Info.
                      *71A : OUR
Cetails of Charges
Trailer
                               MAC:
                               CHK:
                               PDE:
                               POH:
                               CLM:
```

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8236100902
                        SWIFT Single Customer Credit Transfer
MT F
                       F 01 UNCREGSFAXXX 002" 3"3713
Basic Header
                       I 103 CHASUS33XXXX N
Application Header
                        Service Code
                                        103:
User Header
                                      113:
108: 18824115501E0400
                        Sank, Priority
                        Msg User Ref.
                                       119:
                        Validation
                       *20 : 8236100902
Sender's Pef.
Bank Operation Code
                       *238 : CRED
                       *32A : 180824USD2200,00
Settlement Amount
                        338 :
                                     USD2200,00
Instructed Amount
                        ~50 : /BG57UNCR70001520786869
Ordering Customer.
                                IMMUNOTEH LABORATORIES BG OOD
                                 GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                 3 AP. 6, BULGARIA
Ordering Institution
                         52
                                 UNCRBGSFXXX
                         57
Account with Inst.
                                 EOFAUS3N
                        +59 : /0997404058
Seneficiary Customer
                                HARRY HARRIEV ZHABILOV
                                 9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                 775
                         70
                             : BUSINESS
Remittance Info.
                       -71A : OUR
Cetails of Charges
Trailer
                                MAC:
                                CRK:
                                PDE:
                                PDM:
                                DLM:
```

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8261101241
MT F
                           SWIFT Single Customer Credit Transfer
                         F 01 UNCRECSFAXXX 0028 392202
Basic Header
Application Header I 103 CHASUS33XXXX N
                          Service Code 175.
Bank. Priority 113:
Msg User Ref. 108: 18918115500E0500
119:
User Heade:
                          +20 : 8261171241
Sender's Ref.
Bank Operation Code '23B : CRED
Settlement Amount '32A : 18091
                         -32A : 18C918U5D1000,00
33B : JSD10C0,00
-50 : /BC57UNCR70C01520~96869
Instructed Amount
Ordering Customer
                                    IMMUNOTECH LABORATORIES BG
                                    GP, SOFIYA UL. NISHAVA 61 VH. A ET.
                                     3 AP. 6, BULGARIA
                            52
Ordering Institution
                                     UNCRBGSFXXX
                           57 :
Account with Inst.
                                     BOFAUS3N
                           +59 ; /0937404058
Beneficiary Customer
                                    HARRY HARRIEV CHABILOV
                                     9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                     775
                           70 : BUSINESS
Pemittance Info.
                          *71A : OUR
Details of Charges
Trailer
                                    MAC:
                                    CHK:
                                    PDE:
                                    FDM:
                                    DLM:
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8274100685
                         SWIFT Single Customer Credit Transfer
MT F
                        F C1 UNCRBGSFAXXX 0029 402125
Basic Header
                       I 100 CHASUS33XXXX N
Application Header
                                         103:
User Header
                         Service Code
                         Bank, Priority 113:
                                        108: 18A01095001E0500
                         Mag User Ref.
                                         119:
                         Validation
                         *20 : 8274100685
Sender's Ref.
                         *23B : CRED
*32A : :010010511200,00
33B : USC:260,00
Bank Operation Code
Settlement Amount
Instructed Amount
                         *50 : /BG57UNCR70001520786869
Ordering Customer
                                  IMMUNOTECH LABORATORIES BG
                                  GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                  3 AP. 6, BULGARIA
                          52
Ordering Institution
                                  UNCREGSEXXX
                          57
Account with Inst.
                                  ECFAUS3N
                              : /0997404058
                         459
Beneficiary Customer
                                   HARRY HARRIEV ZHABILOV
                                   9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                   779
                          70 : BUSINESS
Remittance Info.
                          *71A * OUR
Details of Charges
Trailer
                                  MAC:
                                  348:
                                  PLE:
                                  71.85:
                                  DLM:
```

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8281100353
                        SWIFT Single Customer Credit Transfer
MT F
                       F 01 UNCREGSFAXXX 00J0 408001
Basic Reader
Application Header
                      1 103 CHASUS33XXXX N
                        Service Code
                                        103:
User Header
                        Bank, Priority 113:
                        May User Ref. 10%:
                                       109: 18A08783001E0200
                       ·20 : 82911C0353
Sender's Ref.
                      *238 : CRED
Bark Opération Code
                      -32A : 181009USC2200,00
Settlement Amount
                                    USD2200,00
Instructed Amount
                        338 1
                        -50 : /BG57UNCR70001520786869
Ordering Customer
                                IMMUNOTECH LABORATORIES BG
                                GR. SOFIYA UL. MISHAVA 61 VH. A ET.
                                3 AP. 6, BULGARIA
                        52
Ordering Institution
                                 UNCREGSFXXX
                         57
Account with Inst.
                                 BOFAUSIN
                        +59 : /0997404058
Beneficiary Customer
                                 HARRY HARRIEV ZHADILOV
                                 9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                 775
                         70 : BUSINESS
Remittance Info.
                        -71A : OUR
 Details of Charges
 Trailer
                                MAC:
                                CHK:
                                PDE:
                                POM:
                                DLM:
```

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8295100372
MT F
                       SWIFT Single Customer Credit Transfer
                     F 01 UNCREGSFAXXX 0030 419337
Basic Header
Application Header
                     I 101 CHASUSSIXXXX N
                       Service Code
                                      103:
'ser Header
                      Bank, Priority 113:
                                      108: 18A22082505E0600
                      Msg User Ref.
                                    119:
                      Validation
                      ·20 : 8295100372
|Sender's Ref.
Bank Operation Code
                      *23B : CRED
                      +32A : 181022USD1200,00
Settlement Amount
                      Instructed Amount
Ordering Customer
                              IMMUNOTECH LABORATORIES BG
                               GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                               3 AP. 6, BULGARIA
Ordering Institution
                        52
                               UNCRBGGEXXX
                       57
Account with Inst.
                               EOFAUS3N
                       +59 : /0997404058
Beneficiary Customer
                              HARRY HARRIEV ZHABILOV
                               9132 FAIRVIEW AVE SAN GABRIEL CA 91
                               775
Remittance Lafo
                       70
                           : BUDINESS
                     TIA . US
Letails of Charges
Trailer
                              MAC:
                              CLK.
                              PDE:
                              PDM:
                              DLM:
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8303100222
                       SWIFT Single Customer Credit Transfer
HT F
                      F 01 UNCREGSFAXXX 0031 426261
Basic Header
Application Header I 103 CHASUS?3XXXX N
                       Service Code
                                      103:
User Header
                       Bank, Priority 113:
                       Mag User Ref. 108:
                                      108: 18A3C082006E0701
                      *20 : 6303100222
Sender's Ref.
Eank Operation Code 238 : CRED
Settlement Amount
                     *32A : 181030US02200.00
                                   USD2200,00
                       338 .
Instructed Amount
                      *50 : /BG57UNCF70001520786869
Ordering Customer
                               IMMUNOTECH LABORATORIES BG
                               CR. SOFIYA UL. NISHAVA 61 VH. A ET.
                               3 AP 6, EULGARIA
                        52 :
Ordering Institution
                               UNCREGSFKXX
                        57 .
Account with Inst.
                               BOFAUS3N
                       *59 : /J997404058
Beneficiary Customer
                               HARRY HARRIEV THABILOV
                               9192 FAIRVIEW AVE SAN GABRIEL CA 91
                               775
                        70 : BUSINESS
Remittance Info.
                       *71A : OUR
Details of Charges
Trailer
                               MAC:
                               CHK:
                               PDE:
                               PCM:
                               CLM:
```

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8313101527
                         SWIFT Single Customer Credit Transfer
MT F
                       F 01 UNCRBGSFAXXX 0031 436286
Basic Header
Application Header
                        I 103 CHASUS33XXXX N
                         Service Code
                                         103:
                         Service Code
Bank. Priority 113:
How Heer Ref. 108: 18B09141007E0701
User Header
                        Mag User Ref. 100:
                        *20 : 83131C1527
Sender's Pef.
Bank Operation Code
                        *238 : CRED
                        +32A : 181109USD2200.00
Settlement Amount
                                       USD2200.00
                         33B :
Instructed Amount
Ordering Customer
                         -50 : /E357UNCR70001520786869
                                  IMMUNOTECH LABORATORIES BG
                                  CR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                  3 AP. 6. BULGARIA
Ordering Institution
                          52 :
                                  UNCREGSFXXX
Account with Inst.
                          57 :
                                  BOFAUS3N
                         *59 : /0997404058
Beneficiary Customer
                                  HARRY HARRIEV ZHABILOV
                                  9192 FAIRVIEW AVE SAN GABRIEL CA 31
                                  775
                          70 : BUSINESS
Remattance info.
                         +71A : DUR
Details of Charges
Trailer
                                 MAJI
                                 CIIK:
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8331101616
MT F
                       SWIFT Single Customer Credit Transfer
                      F 01 UNCREGSFAXXX 0033 444241
Basic Header
Application Header I 103 CHASUS33XXXX N
                       Service Code
                                      103:
User Header
                       Sank. Priority 113:
                       Msg User Ref. 108:
                                      108: 18827133002E0200
                      *20 : 3331101516
Sender's Pef.
                     *238 : CKED
'Pank Operation Code
Settlement Amount
                      +32A : 181127USD3200,00
                                   USD3200,00
                       33B :
Instructed Amount
                      *50 : /BG57UNCR70001520786869
Creering Customer
                               IMMUNOTECH LABORATORIES EG
                               GR. SOFTYA UL. PISHAVA 61 VH. A ET.
                               3 AP. 6, BULGARIA
Ordering Institution
                        52 :
                               UNCEBGSFXXX
Acquant with Inst.
                        57 :
                                BOFAUS3N
                       +59 : /0997404056
Beneficiary Customer
                               HARRY HARRIEV ZHABILOV
                                9192 FAIRVIEW AVE SAN GABRIEL CA 91
                               775
Remittance Info.
                        70 : BUSINESS
Details of Charges
                       *71A : DUR
Trailer
                               MAC:
                               CHE:
                               P05:
                               PDM:
                               DIM:
```

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8337101431
                         SWIFT Single Customer Credit Transfer
MT F
                       F 01 UNCREGGFAXXX 0035 448934
Basic Header
Application Header
                       I 103 CRASUS33XXXX N
                         Service Code
                                         103:
Jeer Reader
                         Bank. Priority 113:
                         Msg User Ref. 108: 18C03124003E0401
Validation 119:
                         *20 : 8337161431
Sender's Ref.
                         -238 : CFED
Bank Operation Code
                         -32A : 151203USD2200,00
33B : USD2200,00
Settlement Amount
Instructed Amount
                         +50 : /BG57UNCR70001520786869
Ordering Customer
                                  IMMUNOTECH LABORATORIES BG
                                  GR. SOFIYA UL. DISHAVA 61 VH. A ET.
                                  3 AP. 6, BULGARIA
Codering Institution
                          52
                                   UNCRBGSFXXX
Account with Inst.
                          37
                                   BOFAUS3N
                         -59 : /0997404558
Reneficiary Customer
                                  HARRY HARRIEV ZHABILOV
                                   9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                   775
                          ים : EUSINESS
Remittance Info.
                         -71A - OUR
Details of Charges
Trailer
                                  MAn:
                                  CHK:
                                  PDE:
                                  PDM:
                                  DLM:
```

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8347101165
                          SWIFT Single Customer Credit Transfer
MT F
                      P 01 UMCRBGSFAXXX 0035 459264
I 103 CHASUS33XXXX N
Basic Header
Application Header
                                           103:
                          Sarvice Code
User Header
                          Bank, Priority 113:
                          Msg User Ref. 108: 18C13114G06E0201
Validation 119:
                          +20 : 8347101165
Sender's Ref.
Bank Operation Code
                          *238 : CRED
                         *32A : 181213USB2200,00

33B : USD2200,00

*50 : /EG57UNCR70001520786869
Saitlement Amount
Instructed Amount
Cidering Customer
                                    IMMUNOTEH LABORATORIES 86
                                    GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                    3 AP. 6. BULGARIA
Ordering Institution
                            52
                                    UNCREGSFXXX
                           57 :
Account with Inst.
                                    BOFAUS3N
                           -59 : /0997404058
Beneficiary Customer
                                    HARRY HARRIEV ZHABILOV
                                    9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                    775
                           70 : EUSINESS
Remittance Info.
                           +71A : OUR
Decails of Charges
crailer
                                   MAC:
                                    CHK:
                                    PDE:
                                    PEM:
                                    DLM:
```

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8361101405
                         SWIFT Single Customer Credit Transfer
MT F
                       F 01 UNCREGSFAXXX 0035 469544
Basic Header
                       I 103 CHASUGERXXXX N
Application Header
                         Service Code
                                        103:
User Header
                         Bank, Priority 113:
                        Msg User Fef. 108: 18C27110004E0100
Validation 119:
                         +20 : $361101405
Sender's Ref.
Bank Operation Code
                        *238 : CRED
                        +32A : 161227USD3200,00
Settlement Amount
                        33B : UCD3200,00
-50 : /BG57UNCR70001520786869
                                      UCD3200,00
Instructed Amount
Ordering Customer
                                 IMMUNOTECH LABORATORIES BG
                                  GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                  3 AF. 6, BULGARIA
Ordering Institution
                          52
                                  UNCREGSTXXX
                          57
Account with Inst.
                                  BOFAUSSN
                         +59 : /0797404058
Beneficiary Customer
                                  MARRY HARRIEV SHABILOV
                                  9192 FAIRVIEW AVE SAN GABRIEL CA 91
Remittance Info.
                          70 : BUSINESS
                        •71A : OUR
 Details of Charges
Trailer
                                 MAC:
                                  CHK:
                                  PDE:
                                  PDD:
                                  DLM:
```

0002100815	
IT F	SWIFT Single Customer Credit Transfer
Basic Header	F 01 UNCRBGSFAXXX D035 472636
Application Header	I 103 CHASUS33XXXX N
Jeer Header	Service Code 103:
	Bank, Priority 113:
	Mag Uper Ref. 108: 19102120504E0500
	Validation 119:
Sender's Ref.	*20 : 9 302 10 08 15
Bank Operation Cods	
Settlement Amount	*32A : 190102US03200,00
Instructed Amount	338 : USC32CO, 00
Ordering Customer	-50 : /8057UNCR70001520786869
	HIMUNOTECH LABORATORIES EG
	GR SOFIYA UL. NISHAVA 61 VH. A ET.
	3 AP 6, BULGARIA
Ordering Institution	5.2
V. (1, 2, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	UNCRESSEXXX
Account with Inst.	57 :
	воглисан
Remeficiary Customer	-59 : /0997404058
	HARRY HARRIEV ZHABILOV
	9192 FAIRVIEW AVE SAN GABRIEL CA 91
	775
Remittance Info	70 : BUSINESS
Cetails of Charges	*TIR : DIR
Trailer	
	MAC:
	CHK:
ı	₽DE:
l	POM:
1	DLM:

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9015101471
                         SWIFT Single Customer Credit Transfer
MT F
                       F 01 UNCFBGSFAXXX 0035 482654
Basic Header
                       I 103 CHASUS33XXXX N
Application Header
                                        103:
                         Service Tode
User Header
                         Bank, Priority 113:
                        Msg User Ref. 108:
                                         108: 19115133505E0100
                         →25 : 90151014<sup>-1</sup>1
Sender's Ref.
                        -23B : CRED
Eank Operation Code
                        *32A : 190115US33200,00
Settlement Amount
                                      usp3200.00
                         33B :
Instructed Amount
                         -50 : /EG57UNCR70001521786869
Ordering Customer
                                  IMMUNOTECH LABORATORIES BG
                                  GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                  3 AP. 6, BULGARIA
Ordering Institution
                          52
                                  UNCREGSFXXX
                          57
Account with Inst.
                                  BOFAUS IN
                              : /0937404058
                         +59
 Beneficiary Customer
                                  HAPRY HARRIEV ZHABIOV
                                  9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                  775
                          70 : BUSINZ33
 Remittance Info.
                          471A : OUR
 Details of Charges
 Traller
                                  MAC:
                                  CHK:
                                  FDE:
                                  POM.
                                  DLM:
```

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9023101076
                         SWIFT Single Qustomer Credit Transfer
MT F
                        F 01 UNCREGSFAXXX 0035 489099
Basic Header
                       I 103 CHASUS 33XXXX N
Application Header
                         Servica Code
User Header
                         Bank, Priority 113:
                         Mag User Ref. 103: 19123124004E0700
                                          119:
                         Validation
                         -20 : 9023101076
Sender's Ref.
                        -23B : CPED
-32A : 190123USD2700,00
Bank Operation Code
Settlement Amount
                          33B :
                                      USD2700,00
Instructed Amount
                         +50 : /BG57UNCR70001520786869
Ordering Customer
                                  IMMUNOTECH LABORATORIES BG OOD
                                  GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                  3 AF. 6, BULGARIA
                          52
Ordering Institution
                                  UNCRESSEXXX
                          57
Account with Inst.
                                  EOFAUS 3N
                         -59 : /0997404058
Beneficiary Customer
                                  HARRY HARIEV ZHABILOV
                                   3192 FAIRWIEV AVE SAN GABRIEL CA 91
                          70 : BUUSINES
 Remittance Info.
                          -71A : CUR
 Details of Charges
 Trailer
                                  MAC:
                                  CHK:
                                  PDE:
                                  PDM:
                                  DLM:
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9030100974
MT F
                          SWIFT Single Cuscome: Credit Transfer
                        F 01 UNCREGSFAXXX C035 494670
Basic Header
Application Header
                        I 103 CHASUS33XXXX N
                         Service Code 100.
Pank. Priority 113:
Mag User Fef. 108: 19130113003E0101
Transfer 119:
User Header
Sender's Ref.
Bank Operation Code
                         *238 : CRED
                         +32A : 19013CUSD3200,00
Settlement Amount
                         33B : USD3200,00
-50 : /EG57UNCR70001520786869
Instructed Amount
Ordering Customer
                                  IMMUNOTECH LABORATORIES LTD.
                                  GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                   3 AF. 6, BULGARIA
Ordering Institution
                         5. :
                                   UNCRBGSFXXX
                         57 :
Account with Inst.
                                   BOFAUS3N
Beneficiary Customer
                          +59 : /0997404058
                                  HARFY HARTEV ZHABILOV
                                   9192 FAIKVIEW AVE SAN GABRIEL CA 91
                                   775
Pemittance Info.
                          70 : BUSINESS
                       *71A : OUR
Deraile of Charges
Trailer
                                  MAC:
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9039101531
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MT F
                        SWIFT Single Customer Credit Transfer
Basic Header
                       F 01 UNCRBGSFAXXX 0037 503028
Application Header
                      1 103 CHASUS33XXXX N
User Header
                        Service Code
                                        103:
                        Bank. Priority 113:
                                        108: 1920814350120200
                        Mag User Ref.
                                      119:
                       Validation
Sender's Ref.
                       *20 : 7039101531
                       *238 : CRED
Bank Operation Code
Settlement Amount
                       -32A : 190208USD4200,00
                        33B :
                                    USD4200, CO
Instructed Amount
Ordering Customer
                        +50 : /ag57UNCH70001520786369
                                IMMUNOTECH LABORATORIES BG LTDOOD
                                GP. SOPIYA OL. HISHAVA 61 VH. A ET.
                                3 AP. 6, BULGARIA
Ordering Institution
                         5.3
                                UNCRBUSEKXX
Account with Inst.
                        57
                                EOFAUS3N
Beneficiary Customer
                        *59 : 20997404058
                                HARRY HARTEV PHABILOV
                                91.1 FAIRVIEW AVE SAN GABRIEL CA 91
                                775
Remittance Info.
                        70
                             : BUSINESS
Details of Charges
                      *71A : OUR
Trailer
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9056101351
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           MT F
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        Jane Helida.
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Mag Teer Fef. 108: *9225023505E0001
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9039101531
MT F
                           SWIFT Single Customer Credit Transfer
Basic Header
                         F 01 UNCRBGSFAXXX 0037 503028
Application Header I 103 CHASUS33XXXX N
                          Service Code sou.
Bank. Priority 113:
Msg User Ref. 108: 19208143501E0200
User Header
'Sender's Ref.
                          *20 : 9039101531
Bank Operation Code '23B : CRED Settlement Amount '32A : 19020
                         *32A : 190208USC4200,00
33B : USC4200,00
*50 : /8057UNCF700C1520786369
Instructed Amount
Ordering Customer
                                    IMMUNOTECH LABORATORIES BG LTDOOD
                                    GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                    3 AP. 6, BULGARIA
Ordering Institution
                            52 :
                                     UNCRBG$FXXX
                            57 :
Account with Inst.
                                     BOPAUS3N
Beneficiary Customer +59 : /0997404058
                                    HARRY HARIEV ZHABILOV
                                     9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                     775
                            70 : BUSINESS
Remittance Info.
                         *73A : OUR
Details of Charges
Trailer
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9056101351
ST F
                          SWIFT Single Customer Credit Transfer
Basic Header
                        F 01 UNCREGSFAXXX 0038 514844
Application Header
                        I 103 CHASUS33XXXX N
                         Service Code 101.
Bank, Priority 113:
Mag User Pef. 108: 19205123505E0701
User Header
Sender's Ref.
Bank Operation Code
                         .23B : CPEO
Settlement Amount
                         -32A : 190225USD2200,00
                         33B : USD2200,00
*50 : /EG$7UNCR7Q001520786969
Instructed Amount
Ordering Customer
                                  IMMUNOTECH LABORATORIES BG LTD
                                  GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                   3 AP. 6, BULGARIA
Ordering Institution
                           52
                                   UNCREGSFXXX
Account with Inst.
                          57
                                   PCFAUS3N
Beneficiary Customer
                         +59 : /0997404058
                                   HARRY HARIEV ZHABILOV
                                   9192 FAIRVIEW AVE SAN GABRIEL CA 9
                                   1775
Remittance Info
                          70 : BUSINESS
Details of Charges
                        *71A : OUR
Trailer
                                  MAC:
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                                  PDE:
                                  POM:
                                  : MJC
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9059101938
MT F
                       SWIFT Single Customer Credit Transfer
Basic Header
                      F 01 UNCREGSFAXXX 0038 518530
Application Header
                      I 103 CHACUS33XXXX N
                       Service Code
                                      103:
User Header
                       Bank. Priority 113:
                       Mag User Ref. 198:
                                       108: 19228142001E0700
Sender's Ref.
                      -20 : 9059101938
Bank Operation Code
                     *238 : CRED
Settlement Amount
                      *32A : 190226USD3200.00
                       338 :
[Instructed Amount
                                   USE3200,00
Ordering Customer
                      +50 : /BG57UNCR70001520786869
                               IMMUNOTECH LABORATORIES BG
                               GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                               3 AP. 6, BULGARIA
Ordering Institution
                       52 :
                                UNCRBGSFXXX
Account with Inst.
                       57
                                BOFAUS3N
                       +59 : /0997404058
Beneficiary Customer
                                HARRY HARRIEV ZHABILOV
                                9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                775
Remittance Info.
                       70 : BUSINESS
                     •71A : OUR
Details of Charges
Trailer
                               MAC:
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                               POE:
                               POM:
                               DLM:
```

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9087100757
MT F
                       SWIFT Single Customer Credit Transfer
                      F 01 UNCPBGSFAXXX 0039 540577
Basic Header
Application Header
                      I 103 CHASUS33XXXX N
                                       103:
                       Service Code
User Header
                       Bank, Priority 113:
                       Mag User Ref. 108:
                                       108: 19328103503E0302
                       *20 : 9087100757
Sender's Ref.
                      +239 : CRED
Eank Operation Code
Settlement Amount
                      +32A : 190328UJD5200.00
                       33B : USD5200,00
Instructed Amount
                       +50 : /BG57UNCR70001520736869
Ordering Customet
                                IMMUNOTECH LABORATORIES BG LTD
                                GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                3 AF. 6, BULGARIA
Ordering Institution
                        52 :
                                UNCREGSFXXX
                        57 :
Account with Inst.
                                BOFAUS3N
Beneficiary Customer
                       159 : /0997404058
                                HARRY HARIEV ZHABILOV
                                9192 FAIRVIEN AVE SAN GABRIEL CA 91
                                775
                        70 : BUSINESS
Remittance Info.
Details of Charges
                       *71A . OUR
Trailer
                               MAC:
                               CHK:
                               PDE:
                               PDM:
                               DLM:
```

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9098101248
                         SWIFT Single Customer Credit Transfer
MT F
                        F 01 UNCRBGSFAXXX 0042 548931
Basic Header
Application Header I 103 CHASUS33XXXX N
                         Service Code
Bank, Priority 113:
113:
11447 Ref. 108: 19408115506E0700
User Header
                         Service Code
                                          103:
                         Msg User Ref. 108:
                         *20 : 9098101248
Sender's Ref.
Bank Operation Code +23B : CRED
Settlement Amount +32A : 190468USD4200,00
Settlement Amount
                         338 :
                                      USD4200.00
Instructed Amount
                       33E : 05074745.17
-50 : /EG57UNCR70001320786869
Ordering Customer
                                  IMMUNOTECH LABORATORIES BG LTD.
                                  SCFIA UL. NISHAVA 61 VH. A ET. 3 AP
                                  . 6, BULGARIA
Ordering Institution
                          52 :
                                  UNCRBGSFXXX
                          57 :
Account with Inst.
                                  BOFAUD3N
                         +59 : /0997404058
Beneficiary Customer
                                  HARRY HARIEV ZHABILOV
                                   9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                   775
Remittance Info.
                          70 : BUSINESS
Details of Charges
                       *71A : CUR
Trailer
                                  MAC:
                                  CHK:
                                  PDE:
                                  PCM:
                                  DLM:
```

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9098101682
MT F
                          SWIFT Single Customer Credit Transfer
                        F 01 UNCFBGSFAXXX 0042 549175
Basic Header
Application Header
                        1 103 CHASUS33XXXX N
User Header
                         Service Code
                                          103:
                         Bank, Priority 113:
                         Msg User Ref. 108: 19408133001E0400
Validation 119:
                         *20 : *298101682
Sender's Ref.
Bank Operation Code
                         *235 : CPED
                        *32A : 1904080501000,00
33B : USD1000,00
*50 : /BG57UNCR70001520786369
Settlement Amount
Instructed Amount
Ordering Customer
                                  IMMUNOTECH LABORATORIES BG LTD
                                  GR. COFIYA UL. NISHAVA 61 VH. A ET.
                                  3 AP. 6, BULGARIA
Ordering Institution
                         52 :
                                   UNCRBGSFXXX
Account with Inst.
                         57 :
                                   BOFAUS3N
                          *59 : /0997404058
Beneficiary Customer
                                   EARRY HARTEV SHABILOV
                                   9192 FAIRVIEW AVE. SAN GABRIEL CA 9
                                   1775
Remittance Info.
                          70 : BUSINESS
                        *71A : OUR
Details of Charges
Trailer
                                  MACE
                                  CHK:
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                                  FOM:
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9151100374
MT F
                          SWIFT Single Customer Credit Transfer
                       F 01 UNCREGSFAXXX 0045 589110
Basic Header
                      I 103 CHASUS33XXXX, N
Application Header
                         Service Code 1v2.
Bank. Priority 113:
Msg User Ref. 108: 19531092502E0101
Tidation 119:
User Header
Sender's Ref.
                        *20 : 9151100374
                         *23B : CRED
Bank Operation Code
                         *32A : 190531USD320U,00
Settlement Amount
                        33B : USB3200, CO
*50 : /BG$7(NCR70001520786869
Instructed Amount
Ordering Customer
                                  IMMUNOTEH LABORATORIES BG
                                  GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                                   3 AP. 6, BULGARIA
Ordering Institution
                         52 :
                                   UNCRHGSFXXX
                          57 :
Account with Inst.
                                   BOFAUS3N
                          -59 : /0997404058
Beneficiary Customer
                                  HAFRY HARIEV CHABILOV
                                   9192 FAIVIEW ARE SAN GABRIEL C A 91
                                   775
Remittance Info.
                          70 : BUSINESS
                        TTIA OUF
Details of Charges
Trailer
                                  MAC:
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9157100382
                        SWIFT Single Customer Credit Transfer
MT F
                     F 01 UNCERG, FAXXX 0045 193445
Basic Header
Application Header T 103 CnAs 533XXXX N
                       Service Code
                                       103:
User Header
                       Bank, Priority 113:
                                    108: 19606090003E0200
119:
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                       ·23 : 9157100382
Sonder's Ref.
Bank Operation Code *23B : CRED
                     *32A : 190606USI52CO,00
Settlement Amount
                        33B :
                                    USD5200,00
Instructed Amount
                       *50 : /BG57UNCR7CC01520786869
Ordering Customer
                               IMMUNOTECH LABORATORIES BG LTD
                                GR. SOFIYA UL. NISHAVA 61 VH. A ET.
                               3 AP. E. BULGARIA
Ordering Institution
                       53
                                CHCRBGSFXXX
                        57
Account with Inst.
                                BOEAUS3N
                        *59 : /0997404058
Beneficiary Customer
                                HARRY HARIEV ZHABILOV
                                9192 FAIRVIEW AVE SAN GABRIEL CA 91
                                775
                        70 : BUSINESS
Remittance Info.
 Details of Charges
                      '71A : CUR
Trailer
                               MAC:
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EXHIBIT 1

Case 2:22-cv-00861-JAD-VCF Document 1 Filed 05/31/22 Page 158 of 159

21.06.2017 r. Print

_Subject: Re:

From: Harry Zhabilov (zhabilov@att.net)

To: vital_fe@yahoo.com;

Date: Tuesday, June 20, 2017 6:35 PM

Zdravei Mitko prashtam ti moil komentar na angliiski za po goliama dostovernost Otivam do pyramid da dovoria s Medhad. Ne se pritesniavai sherovete se zapazvat 1:1 clads A te sa osnovnite

In terms of the merger which are committed with Petroleum, Eco Solitions Inc., it may be considered for

1. replace ordinary share 1. I share for theire of the new company

The Series A shares are 1 has

ECPO will issue the Bulgarian conting incy odditional shares Of ECPO in the amount to make the exchange equal 1 if for its Screen bound common shares at a minus for the polyment for the production of the 9,000 vials. We are doing this so that shareholders, not insociated with the permit and minut order will not expect the same treatment.

2 the proferent of hards of sometimes and objected with a life of the name of the your suggest with the or lineary. And class a following acade with a class in the name of the highest of the source.

The Series A are exchanged 1 is and are not convertible into ECPO shares as they were never some $-e^{-\epsilon}$.

IMMB Common but were only issued for voting purposes. The Series B once you receive them do not have to be converted into ECPO Common Shares and can be held by you as low a seyou desire.

We will need a latent Brown on The Folia of the help of the attention of the second of the second of the Bulgaria to make stand the second of the second of

Funding for the intrant of the provided and can impraciately suit to continuous this direction be tall so think any president of the second of the second of the head of the h

We appreciate all the efforts you have made in getting the permit usued in the EU and understand the a impact on IMM." and now ECPO. Our combined efforts will advance the two cutities forward and unito kind shareholder value that has laid dormant for years.

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

CONSENT FOR ELECTRONIC SERVICE OF DOCUMENTS

I, DIMITAR SLAVCHEV SAYOV (Print Full Name)
consent to receive electronic notices of filings and/or delivery of documents by email.
I am providing my email address for the purpose of sending me electronic notice of any Order or other filing in my case with a link to the filed document. I understand that hard (paper) copies of orders will no longer be sent to me by the Court.
I understand that if my email or mailing address changes, it is my responsibility to notify the Court in writing of my new email or mailing address.
I understand that email filters (SPAM filters) may interfere with my receipt of email notifications and I will ensure that my email will not filter out messages from cmccf@nvd.uscourts.gov.
I have already registered <i>or</i> will immediately register for a PACER account (Public Access to Court Electronic Records).
I understand that consenting to service by email does not authorize me to file my documents electronically. I may request the court's authorization to register as an electronic filer by filing a separate written motion request (LR IC 2-1(b)).
Date: MAY 31, 2022 Signature Signature
Email Address (Please print legibly):
dimitar-savor @ ymail. com
Confirm Email Address:
dinitar. SAVOV @ ymail. com
Mailing Address:
61 Nishava str. ent. A fl. 3 ap 6, Sojia 1680; Bulgar
Telephone Number:
<u> +359 88 9988 313 </u>
Case Number(s):